

EXHIBIT A

Secretary
U.S. Department of Homeland Security
Washington, DC 20528



Homeland
Security

January 28, 2025

MEMORANDUM FOR COMPONENT AND OFFICE HEADS

FROM: Kristi Noem
Secretary

SUBJECT: **Direction on Grants to Non-governmental Organizations**

Over the last four years, the Department of Homeland Security has spent billions of dollars funding illegal immigration. Much of this funding was given to non-profit organizations, which purported to provide a variety of services to illegal aliens. Effective immediately, all Department grant disbursements and assessments of grant applications that: (a) go to non-profit organizations or for which non-profit organizations are eligible, and (b) touch in any way on immigration, are on hold pending review, except to the extent required by controlling legal authority.

The reasons for this freeze include (1) concerns that these grants may be funding illegal activities, such as encouraging or inducing illegal immigration, 8 U.S.C. § 1324(a)(1)(A)(iv), or illegal harboring of illegal aliens, 8 U.S.C. § 1324(a)(1)(A)(ii)–(iii); (2) concerns that there may be racially discriminatory language in certain grants; and (3) concerns that these grants may not be an efficient use of government resources.

Within 7 days, each component shall provide a report to the Undersecretary for Management with a summary of every grant covered by this memorandum and its status. Also within 7 days, any component that invokes the exception above for grants required by controlling legal authority must obtain the express written consent of the General Counsel or his delegate. Finally, within 7 days, the chief counsel of each component shall provide a report to the General Counsel regarding all available legal tools to investigate whether grantees have or are using Department grant funds for illegal purposes, including any statutory, regulatory, or contractual authority to request or demand documents.

The Department is committed to allocating grant funds in a manner that will achieve maximum effectiveness for the intended purposes and in fulfillment of the Department's statutory mission. This hold does not in any way apply to disbursement of essential disaster relief funds, but it does apply to the Shelter and Services Program, and any similar program.

EXHIBIT B

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
*Office of Citizenship, Partnership &
Engagement*
5900 Capital Gateway Dr.
Camp Springs, MD 20588-0009



U.S. Citizenship
and Immigration
Services

February 4, 2025

USCIS Grant Recipient:

Pursuant to the Department of Homeland Security Secretary Kristi Noem's memorandum dated January 28, 2025, and effective immediately, your grant from U.S. Citizenship & Immigration Services is frozen.

In accordance with the pause in activities, payments are not available at this time.

We recognize this will have an impact on your organization. We are unable to provide a timeline on this freeze.

Thank you for your cooperation.

Sincerely,

Jane Sommerville
Grants Branch Chief

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Solutions in Hometown Connections, *et al.*,

Plaintiffs,

v.

Kristi Noem, *et al.*,

Defendants.

Civil Case No. 8:25-cv-00885-LKG

DECLARATION OF MERRITT GROESCHEL

I, Merritt Groeschel, declare under penalty of perjury, under 28 U.S.C. § 1746, that the following is true and correct:

1. I am the Executive Director of Solutions in Hometown Connections (“SHC”). I have held that position since 2017. As Executive Director, I oversee all operations, programming, and finances of SHC. This declaration is based on my firsthand knowledge of the facts as stated here.
2. SHC is a Maryland-based nonprofit founded in 2017. We aim to support refugee and newcomer families, and help integrate them into their new communities.
3. SHC specifically works with lawful permanent residents who are humanitarian immigrants, many of whom are SIV (Special Immigrant Visa) holders: Afghan or Iraqi nationals granted a special visa for their service to the U.S. government. Our clients are largely the spouses of these SIV holders. Overwhelmingly, these are women with small children who have not had any formal educational opportunities.

4. SHC offers an array of tailored programs to serve this group, including multi-generational English classes, tutoring, childcare services, early childhood education, and citizenship preparation classes.

5. SHC devotes enormous amounts of resources to each client. SHC works with many of our clients for five years. Our program trains them from basic English literacy to citizenship preparation. We even hire alumni to become childcare providers for the next set of clients, helping provide them with professional work experience.

6. SHC applied for, and received, a CARING grant from Defendant USCIS pursuant to the funds appropriated by Congress for Fiscal Year 2023. The FY2023 CARING grant is for \$267,000 over a two-year period to provide, at a minimum, citizenship instruction, English-language learning, legal services, and digital-literacy assistance to 180 immigrants. The FY 2023 CARING grant has a performance period from October 1, 2023 through September 30, 2025. The grant requires quarterly reporting on performance metrics and expenses. The grant award letter that we received included a provision stating that “2 CFR Part 200,” the “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Award,” is “incorporated into this Award by this reference.”

7. SHC is the only CARING grant recipient in the country.

8. Becoming the only CARING recipient in the country required a significant amount of SHC’s resources, demanding extensive planning for over a year.

9. The CARING grant is unique among all DHS grants. It allows funding of work with vulnerable lawful permanent residents including SIV holders and their families, which form the bulk of SHC’s clients. It also funds basic literacy instruction, which is a unique need to SHC’s client base.

10. On February 4, 2025, SHC received an email sent from the CitizenshipGrantProgram@uscis.dhs.gov email address and signed by Jane Sommerville, USCIS Grants Branch Chief, attaching a letter from Mary Jane Somerville (referred to herein as the “Notice of Award”). The Notice stated that, “[p]ursuant to the Department of Homeland Security Secretary Kristi Noem’s memorandum dated January 28, 2025, and effective immediately, your grant from U.S. Citizenship & Immigration Services is frozen.” The Notice stated that “payments are not available at this time,” and that USCIS “recognize[d] this will have an impact on your organization” but was “unable to provide a timeline on this freeze.”

11. SHC submitted a reimbursement request on February 25, 2025, but received a notification that they would not be able to receive a payment.

12. SHC submitted another reimbursement request on March 13, 2025, but received no response.

13. SHC also emailed its grant and programs officers on February 4, February 6, March 1, and March 13, 2025 but received no response.

14. SHC has \$86,000 left to draw down on its grant for services planned until September 30, 2025.

15. The freeze has had a direct impact on SHC. We have eliminated all paid legal services, rolled back integration services to be on-request only, increased student-to-teacher ratios, canceled planned classes and field trips, and halted childcare for our students, who are primarily mothers and rely on these services to attend.

16. SHC is currently subsidizing the current class through its own scarce unrestricted funds, to avoid disruption to the clients it promised to serve. But even this funding will taper off once the current session is over on March 25, 2025, and there will be no funds left to cover the new session starting in April.

17. Once the session is over and if funding is not restored, we may be forced to cut classes, stop civic instruction entirely, ask students to begin de-enrolling, and potentially move to a volunteer model.

18. This would have devastating impacts beyond just the immediate class. SHC has spent years building up a reputation among the SIV community as the prime provider of these services to SIV spouses. Suddenly having to shut our services down in less than a month will damage our trust and credibility.

19. Additionally, SHC does not just provide classes: we also employ many of our former clients as well. Having to shut the classes down means it will have to reduce hours or lay off women who have never been financially independent or employed before. This will have a significant ripple effect through their communities. For many of them, this is their livelihood.

20. Due to the funding freeze, we have had to turn away clients seeking our services. This is heartbreaking work. A few weeks ago, we had to turn away a woman whose husband abused her, prevented her from leaving the home, and then later left her. She couldn't speak or read English. We didn't have funds to help. Instead of being able to reach out and help her through our programs, all we could do was give her another phone number to try and call.

21. SHC is the only organization in the country that receives the CARING grant to provide these resources to spouses of SIV holders. This is a vulnerable community: they are mostly women with children, with low literacy rates, a lack of formal education, and no professional work experience. SHC has spent years working with them to build literacy, become citizens, and find employment. Without this grant, there would be no other organization that could fill this vacuum.

Greenbelt, Maryland
March 21, 2025



Merritt Groeschel

EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Solutions in Hometown Connections, *et al.*,

Plaintiffs,

v.

Kristi Noem, *et al.*,

Defendants.

Civil Case No. 8:25-cv-00885-LKG

DECLARATION OF ABEL NUNEZ

I, Abel Nunez, declare under penalty of perjury, under 28 U.S.C. § 1746, that the following is true and correct:

1. I am the Executive Director of Central American Resource Center (“CARECEN”). I have held that position since 2013. In my role as Executive Director, I supervise the organization as a whole, including all of its departments. This declaration is based on my firsthand knowledge of the facts as stated here.

2. CARECEN is a Washington, DC-based nonprofit founded in 1981. It helps immigrants in the DC metropolitan region transition to an integrated life in their new home community.

3. CARECEN’s services include low-cost citizenship classes, citizenship tutoring and interview preparation, and assistance with naturalization applications.

4. CARECEN’s citizenship services are uniquely comprehensive. We offer client support before the test, during the test, and after the test, through passport assistance and voter registration

assistance. Our citizenship classes are large, enrolling 80 students per semester and providing 40 hours of instruction over 10 weeks.

5. CARECEN applied for, and received, a CINAS grant from Defendant USCIS pursuant to the funds appropriated by Congress for Fiscal Year 2023. The FY2023 CINAS grant is for \$450,000 over a two-year period to provide, at a minimum, citizenship instruction to 300 LPRs, administer naturalization eligibility screenings to 300 LPRs, and file 300 Forms N-400 and G-28. The FY 2023 CINAS grant has a performance period from October 1, 2023, through September 30, 2025. The grant requires quarterly reporting on performance metrics and expenses. The grant award letter that we received included a provision stating that “2 CFR Part 200,” the “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Award,” is “incorporated into this Award by this reference.” CARECEN has received CINAS funding twice before: from 2012-2014, and 2016-2018.

6. On February 4, 2025, CARECEN received an email sent from the CitizenshipGrantProgram@uscis.dhs.gov email address and signed by Jane Sommerville, USCIS Grants Branch Chief, attaching a letter from Mary Jane Somerville (referred to herein as the “Notice of Award”). The Notice stated that, “[p]ursuant to the Department of Homeland Security Secretary Kristi Noem’s memorandum dated January 28, 2025, and effective immediately, your grant from U.S. Citizenship & Immigration Services is frozen.” The Notice stated that “payments are not available at this time,” and that USCIS “recognize[d] this will have an impact on your organization” but was “unable to provide a timeline on this freeze.”

7. This notice was a shock to us. We understood our CINAS funding to be frozen immediately, and we began contingency planning to figure out all the programs and staff that would potentially be affected.

8. CARECEN has \$169,000 remaining on its grant for services it has planned through September 30, 2025. CARECEN would typically submit a voucher in April for our January-March expenses and would submit two more through the remainder of the performance period.

9. CARECEN submitted a reimbursement request on March 21, 2025, with no response received as of yet.

10. CARECEN emailed its grants officer on March 12, 2025 for further guidance, with no response received as of yet.

11. This freeze has had immediate consequences for CARECEN . As a direct result of the funding freeze, we have laid off our part-time instructors, and had to reallocate funds from other programs to cover the remaining two citizenship program managers funded by the grant. Because of that reallocation, we have also had to lay off an additional part-time employee working on different CARECEN programming. Laying off our employees was an incredibly difficult decision that we were forced to make.

12. The freeze and subsequent layoffs have harmed staff and instructor morale, as they are no longer certain that CARECEN will be able to pay them.

13. Relying on the grant, CARECEN had offered its citizenship classes for free, and distributed free preparation materials and books to its students. The organization had also invested significant internal resources into preparing its staff to be able to offer services mandated by the grant, such as having all of its citizenship administrator staff take the TESOL (Teachers of English to Speakers of Other Languages) certification (120 hours of paid time).

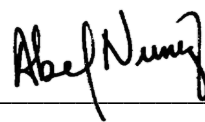
14. The freeze has also had significant damaging effects on CARECEN's reputation in the community. We have had to change our payment structure from free classes for English students to at-cost, overnight. This felt like a betrayal of our mission and our students' trust: typically, this

sort of drastic change would take many weeks of preparation and communication to help them adjust. Here, we had to do it suddenly and without any warning.

15. Freezing the grant has almost been akin to just taking the money back. CARECEN cannot simply stop or start these programs back up again on a dime. We have been forced to shift money around to cover immediate services, leaving a gap in the budget for other services and creating a spillover effect on the rest of the organization. If the freeze continues, we will have to significantly reduce our citizenship classes, relying on uncertified volunteers and charging clients the full cost of the service. The investments we have made to comply with the grant terms will be lost, and additional layoffs may result from the loss of funding.

16. CARECEN provides unique, wraparound services to its clients before, during, and after the citizenship application. Our comprehensive services and open communication with our students are a point of pride for us. Having to fire instructors, change payment structures, and potentially drastically scale back the program as a whole threatens to cripple the organization's resources and tarnish its credibility. The longer the freeze continues, the more permanently these harms will damage CARECEN, its reputation, and the communities it serves.

Washington, DC
March 20, 2025



Abel Nunez

EXHIBIT E

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Solutions in Hometown Connections, et al.,

Plaintiffs,

v.

Kristi Noem, et al.,

Defendants.

Civil Case No. 8:25-cv-00885-LKG

DECLARATION OF ANGELICA SALAS

I, Angelica Salas, declare under penalty of perjury, under 28 U.S.C. § 1746, that the following is true and correct:

1. I am the Executive Director of the Coalition for Humane Immigrant Rights (“CHIRLA”). I have held that position since 1999. In my role as Executive Director of CHIRLA, I oversee the organization’s programming, fundraising, operations, and advocacy efforts. This declaration is based on my firsthand knowledge of the facts as stated here.

2. CHIRLA is a Los-Angeles based nonprofit founded in 1986 that helps provide services to immigrants and refugees throughout the state of California.

3. CHIRLA provides an array of direct services and advocacy efforts, including citizenship classes, legal assistance, civic engagement efforts, hotlines, and shelter services.

4. Over decades of work, CHIRLA has built a unique connection with Latino and other low-income, naturalization-eligible community in California. California has the largest naturalization-eligible population in the United States, many of whom are particularly difficult to reach given

linguistic, regional, and historical barriers. Through word-of-mouth and years of building trust, we have built a strong reputation as a dependable services provider.

5. CHIRLA applied for, and received, a CINAS grant from Defendant USCIS pursuant to the funds appropriated by Congress for Fiscal Year 2023. The FY2023 CINAS grant is for \$450,000 over a two-year period to provide, at a minimum, citizenship instruction to 200 LPRs, administer naturalization eligibility screenings to 200 LPRs, and file 200 Forms N-400 and G-28. The FY 2023 CINAS grant has a performance period from October 1, 2023 through September 30, 2025. The grant requires quarterly reporting on performance metrics and expenses. The grant award letter that we received included a provision stating that “2 CFR Part 200,” the “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Award,” is “incorporated into this Award by this reference.” CHIRLA has received CINAS funding twice before: from 2014-2016, and 2021-2023. It also received the USCIS Innovation in Citizenship Education grant for 2022-2024.

6. On February 4, 2025, CHIRLA received an email sent from the CitizenshipGrantProgram@uscis.dhs.gov email address and signed by Jane Sommerville, USCIS Grants Branch Chief, attaching a letter from Mary Jane Somerville (referred to herein as the “Notice of Award”). The Notice stated that, “[p]ursuant to the Department of Homeland Security Secretary Kristi Noem’s memorandum dated January 28, 2025, and effective immediately, your grant from U.S. Citizenship & Immigration Services is frozen.” The Notice stated that “payments are not available at this time,” and that USCIS “recognize[d] this will have an impact on your organization” but was “unable to provide a timeline on this freeze.”

7. After noticing the payment website running into issues, CHIRLA’s Managing Director withdrew funds on the morning February 4, 2025, to last till the end of the next quarterly reporting

period on March 31, 2025. This was essentially an advance payment to enable CHIRLA to provide resources for its citizenship classes, instead of the typical reimbursement process. Hours later, CHIRLA received the Noem memo freezing all funds.

8. CHIRLA submitted a reimbursement request on March 13, 2025, after the letter was issued, with no response.

9. CHIRLA also tried to contact its grants officer on March 13, 2025. To date, there has been no response.

10. CHIRLA has \$100,936.16 remaining on its grant for services it has planned through September 30, 2025.

11. The freeze has had a sweeping, direct impact on CHIRLA. CHIRLA has been forced to divert limited funds from other parts of the organization, and our development team has had to divert significant resources into trying to find potential replacement state or local grants to sustain the program long-term. If the freeze is not lifted soon, we may be forced to shut down the citizenship instruction program entirely.

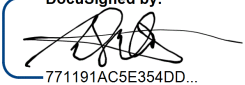
12. The citizenship program is particularly important to CHIRLA. It is the gateway program for many of our clients: it helps build trust and credibility, and many of them later become CHIRLA members and contribute to the organization in different ways. Without the program, we lose not only the direct services it provides, but a critical talent pipeline.

13. The freeze has also caused significant harm to CHIRLA's reputation with the communities it serves. These communities have been historically hard-to-reach, and we have spent decades trying to build trust as a credible pipeline to citizenship. Clients have already spent time and resources into the process, such as paying a USCIS naturalization fee, putting their trust in CHIRLA to deliver the promised resources. If CHIRLA is forced overnight to begin charging for

what it promised to be low or no-cost services, or has to shut the citizenship instruction program entirely, it will cause irreparable harm to our reputation.

14. The CINAS funding freeze imperils CHIRLA's long-term ability to provide citizenship classes. If the freeze is not lifted by the next quarterly period, CHIRLA will have to either continue diverting significant resources from the rest of the organization, or close the citizenship instruction program entirely. This would impair our ability to provide core integration services, and harm the reputation of reliability that we are well-known for.

Los Angeles, California
March 21, 2025

DocuSigned by:

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Angelica Salas

EXHIBIT F

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Solutions in Hometown Connections, *et al.*,

Plaintiffs,

v.

Kristi Noem, *et al.*,

Defendants.

Civil Case No. 8:25-cv-00885-LKG

DECLARATION OF CAITLYN LEWIS

I, Caitlyn Lewis, declare under penalty of perjury, under 28 U.S.C. § 1746, that the following is true and correct:

1. I am the Executive Director of the Community Center for Immigrants (“CCI”). I have held that position since 2021. In my role as Executive Director, I oversee all the organization’s programming, education, communication, and funding. This declaration is based on my firsthand knowledge of the facts as stated here.

2. CCI is a nonprofit based in Milwaukee, Wisconsin that was founded in 2021. We provide immigration legal services and educational programming for low-income immigrant individuals and families.

3. CCI offers a wide array of direct services, including affordable immigration legal services, free citizenship classes, free English classes, and free online courses to assist in passing the naturalization interview.

4. Many of CCI's clients are from hard-to-reach, particularly vulnerable communities: domestic violence survivors, refugees, and individuals with little formal education.

5. CCI is one of the few nonprofits in Milwaukee providing these types of affordable legal services to low-income communities. We have spent years building trust through word-of-mouth and credible, detailed work. Our organization allocates significant resources into each client: an average client's naturalization case takes nine months, from citizenship classes, to holding mock interviews, to accompanying them to the actual interview. We commit to supporting them every step of the way.

6. CCI applied for, and received, a CINAS grant from Defendant USCIS pursuant to the funds appropriated by Congress for Fiscal Year 2023. The FY2023 CINAS grant is for \$300,000 over a two-year period to provide, at a minimum, citizenship instruction and naturalization application services to 200 individuals. The FY 2023 CINAS grant has a performance period from October 1, 2023 through September 30, 2025. The grant requires quarterly reporting on performance metrics and expenses. The grant award letter that we received included a provision stating that "2 CFR Part 200," the "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Award," is "incorporated into this Award by this reference."

7. On February 4, 2025, CCI received an email sent from the CitizenshipGrantProgram@uscis.dhs.gov email address and signed by Jane Sommerville, USCIS Grants Branch Chief, attaching a letter from Mary Jane Somerville (referred to herein as the "Notice of Award"). The Notice stated that, "[p]ursuant to the Department of Homeland Security Secretary Kristi Noem's memorandum dated January 28, 2025, and effective immediately, your grant from U.S. Citizenship & Immigration Services is frozen." The Notice stated that "payments are not available at this time," and that USCIS "recognize[d] this will have an impact on your organization" but was "unable to provide a timeline on this freeze."

8. CCI heard about a potential funding freeze on January 27, 2025, and proactively filed for reimbursement for its January 2025 expenses under the CINAS grant. It filed on January 28, 2025 for \$16,755.43 in expenses. The reimbursement was paid out on February 3, 2025, a day before the funding freeze letter was received.

9. On February 14, 2025, CCI requested another reimbursement, this time for the period of late January to mid-February. The reimbursement request was marked approved on February 19, 2025, but no funds have been released to date. This is atypical, as reimbursements typically take only one to two business days.

10. CCI submitted another reimbursement request on March 12, 2025, with no response received.

11. CCI also emailed its grants officer on March 12, 2025. To date, the grants officer has not responded.

12. CCI has \$100,000 remaining on its grant for services it has planned through September 30, 2025.

13. The freeze's effects have been immediate. One of our part-time instructors quit due to funding uncertainty. There is so much stress on our instructors and staff. Morale is at a low, and some of our employees have already begun looking for other jobs. We have been forced to stop accepting any new clients, despite the demand. CCI has tried to subsidize the classes by borrowing funding from other parts of the organization, but this is only a short-term emergency solution.


14. The harm of the freeze will only continue. If the funding freeze is not lifted, CCI may need to lay off four staff members. It may also soon be forced to cut its citizenship classes and naturalization services entirely.

15. Without CCI, the communities it serves will have to rely on private firms with unaffordable rates, or predatory firms that have filed a number of USCIS applications incorrectly

in the past. If the freeze is not lifted soon, it will leave an enormous vacuum in legal services to the Milwaukee communities we specifically sought to serve. As a young organization still building our reputation among a hard-to-reach community, a sudden shutoff of our services will cause irreparable harm to our credibility.

16. If CCI has to suddenly wind down or stop the classes it promised to provide, it will also suffer significant harm to its reputation among an already hard-to-reach community. This freeze is directly hurting our long-term ability to recruit new clients and be seen as a reliable service provider. We have spent time and resources building relationships with vulnerable communities that have little access to other resources. If we close, there will be few other options left for them. The pipeline to citizenship will become narrower. There will be fewer voices in civic life that represent the full experience of our city, and the entire Milwaukee community will suffer for it.

Milwaukee, Wisconsin
March 21, 2025



Caitlyn Lewis

EXHIBIT G

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Solutions in Hometown Connections, *et al.*,

Plaintiffs,

v.

Kristi Noem, *et al.*,

Defendants.

Civil Case No. 8:25-cv-00885-LKG

DECLARATION OF KATIE DONOVIEL

I, Katie Donoviel, declare under penalty of perjury, under 28 U.S.C. § 1746, that the following is true and correct:

1. I am the Executive Director of the English Skills Learning Center (ESLC). I have held that position since 2020. In my role, I ensure that we have high-quality programming, and capacity building through curriculum-development and fund development. This declaration is based on my firsthand knowledge of the facts as stated here.

2. ESLC is a West Valley City, Utah-based nonprofit that was founded in 1988. We focus on helping integrate and strengthen communities through breaking cultural and language barriers.

3. ESLC's programs include free Citizenship Classes to help prepare for the interview, a Life Skills program that focuses on literacy and everyday English, an Adult Emergent Readers program to help with adult literacy, and a Workplace English program that focuses on providing job-specific English language training to employees.

4. The Citizenship Class is at the core of ESLC's integration efforts. Attaining citizenship helps our clients, many of whom are former refugees, name this country as home. This has a deep emotional resonance for them. Practically, it helps them engage in civic life fully, through voting, running for office, and federal employment opportunities.

5. The Citizenship Class runs for 11 weeks, two times a week for two hours per class. It enrolls 65 students at five different locations across Salt Lake County. In addition to the classes, ESLC works one-on-one with clients for interview preparation.

6. ESLC is the preeminent provider of citizenship classes in Northern Utah. Our reputation is so strong that other organizations, who either were providing these services or were interested in providing these services, now instead refer clients to us.

7. Part of this reputation comes from ESLC's custom-made, high-quality curriculum. Instead of simply adopting template material, we have built our own citizenship curriculum material from the ground up. Our English learning courses are intertwined with content in civics and history. We bring local civic officials to give presentations and teach about the importance of civic service. And our entire andragogy is designed with a focus on interactivity.

8. The quality of ESLC's programming has been long-recognized by USCIS itself. ESLC has applied for and been awarded CINAS funding during every eligible grant cycle since 2009, the launch of the grant program. In the most recent cycle, ESLC's grant was increased from the requested amount post-application. ESLC was told by the grant officers that this was a testament to the quality of the program, and the need in Utah.

9. ESLC applied for, and received, a CINAS grant from Defendant USCIS pursuant to the funds appropriated by Congress for Fiscal Year 2023. The FY2023 CINAS grant is for \$450,000 over a two-year period to provide, at a minimum, citizenship instruction to 200 LPRs, administer naturalization eligibility screenings to 440 LPRs, and to file 400 naturalization applications. The

FY 2023 CINAS grant has a performance period from October 1, 2023 through September 30, 2025. The grant requires quarterly reporting on performance metrics and expenses. The grant award letter that we received included a provision stating that “2 CFR Part 200,” the “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Award,” is “incorporated into this Award by this reference.”

10. On February 4, 2025, ESLC received an email sent from the CitizenshipGrantProgram@uscis.dhs.gov email address and signed by Jane Sommerville, USCIS Grants Branch Chief, attaching a letter from Mary Jane Somerville (referred to herein as the “Notice of Award”). The Notice stated that, “[p]ursuant to the Department of Homeland Security Secretary Kristi Noem’s memorandum dated January 28, 2025, and effective immediately, your grant from U.S. Citizenship & Immigration Services is frozen.” The Notice stated that “payments are not available at this time,” and that USCIS “recognize[d] this will have an impact on your organization” but was “unable to provide a timeline on this freeze.”

11. ESLC submitted a reimbursement request on March 12, 2025, with no response received.

12. ESLC had \$186,531.19 left in the grant for the grant cycle, including the \$13,684.55 we already spent and were unable to submit reimbursement for.

13. The freeze’s impact has been drastic. ESLC cannot fund its programs without the grant. Immediately on February 4, 2025, we called an emergency meeting with our internal citizenship team. We had to move our Citizenship Program instructor to a different funding stream, which can only be sustained until mid-April. And we had to move our Citizenship Program coordinator to a different program entirely, which has nothing to do with citizenship support and does not leverage her knowledge of the naturalization process or the community rapport that she has established in this role over the last three years

14. If funding is not unfrozen, we will be forced to move to a volunteer-led program as soon as next month. This will severely impact the quality of instruction we can provide. Our staff are at the heart of our high-quality services. Moving our coordinator, who is tri-lingual, has already impacted recruitment efforts significantly and crippled community outreach efforts. And ESLC's current instructor is an award-winning teacher with over 40 years of experience, who helped design the curriculum from the ground-up. She cannot be replaced.

15. The freeze also has long-term effects. One staff member has already left after being concerned he could not provide for his family given the funding uncertainty. Other staff are also weighing their options. This staff shortage, borne out of the funding freeze uncertainty, will make it challenging for ESLC to fulfill its grants long-term even after the freeze is lifted.

16. While the organization has tried to the best of its ability to insulate its students from the catastrophic effects the freeze has had, students will also likely begin dropping from the class if it shifts to a fully volunteer-led model. Learning that ESLC is under scrutiny by the federal government may also scare off our clients, who could be worried that they will be punished by association and may never come back. This will have a significantly damaging impact on ESLC's reputation long-term.

17. ESLC has provided customized, high-quality instruction to lawful permanent residents in Salt Lake County for decades. Our history and track record has earned us reputé as the preeminent provider of citizenship classes in the Northern Utah area.

18. The funding freeze has already forced major changes to ESLC's citizenship program, and threatens to close the program entirely if it continues. This will have a devastating impact on the communities ESLC has long served, and threatens to permanently damage its reputation.

West Valley City, Utah

Katie J. Donoviel

March 24, 2025

Katie Donoviel

EXHIBIT H

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Solutions in Hometown Connections, et al.,

Plaintiffs,

v.

Kristi Noem, et al.,

Defendants.

Civil Case No. 8:25-cv-00885-LKG

DECLARATION OF KEN R. WHITTAKER

I, Ken R. Whittaker, declare under penalty of perjury, under 28 U.S.C. § 1746, that the following is true and correct:

1. I am the Executive Director of Michigan United. I have held that position since 2021. In my role, I oversee and supervise all of Michigan United's departments, management, and funds. This declaration is based on my firsthand knowledge of the facts as stated here.

2. Michigan United is a Detroit-based nonprofit that was founded in 2013, as a merger between the Michigan Organizing Project (MOP) and the Alliance for Immigrant Rights & Reform (AIR). We are a statewide coalition that works with marginalized communities to advocate for the environment, immigration reform, and an end to mass incarceration.

3. Michigan United offers a number of programs to the immigrant community through its Legal Services Department, including citizenship classes, English language classes, assistance with immigration applications, and low-cost legal services.

4. Citizenship classes are at the heart of Michigan United's legal services programming. The citizenship test is the major obstacle many immigrants face in the naturalization process. Assisting them in passing the test and obtaining citizenship helps our larger goal to increase civic participation.

5. The citizenship classes run for 14 weeks, for three hours per week. There are two main in-person locations for the classes: Grand Rapids and Detroit. We also have an online class. The classes are the foundation for the rest of the program. Many of our students are nervous about the legal system and the process to become a citizen. But through the 14-week classes, our staff slowly builds rapport and trust with the students, which helps the rest of the naturalization application go more smoothly.

6. Michigan United is one of the few service providers to low-income communities within Grand Rapids and Detroit. Low-income communities who need naturalization assistance are an often-overlooked niche in Michigan, where auto-industry companies often provide such services to their employees for free. The market rates for private immigration attorneys are high and unaffordable for low-income communities. They have few other resources to turn to.

7. Michigan United applied for, and received, a CINAS grant from Defendant USCIS pursuant to the funds appropriated by Congress for Fiscal Year 2023. The FY2023 CINAS grant is for \$300,000 over a two-year period to provide, at a minimum, citizenship instruction and naturalization-application services to 200 LPRs. The FY 2023 CINAS grant has a performance period from October 1, 2023 through September 30, 2025. The grant requires quarterly reporting on performance metrics and expenses. The grant award letter that we received included a provision stating that "2 CFR Part 200," the "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Award," is "incorporated into this Award by this reference."

8. On February 4, 2025, Michigan United received an email sent from the CitizenshipGrantProgram@uscis.dhs.gov email address and signed by Jane Sommerville, USCIS Grants Branch Chief, attaching a letter from Mary Jane Somerville (referred to herein as the “Notice of Award”). The Notice stated that, “[p]ursuant to the Department of Homeland Security Secretary Kristi Noem’s memorandum dated January 28, 2025, and effective immediately, your grant from U.S. Citizenship & Immigration Services is frozen.” The Notice stated that “payments are not available at this time,” and that USCIS “recognize[d] this will have an impact on your organization” but was “unable to provide a timeline on this freeze.”

9. Michigan United submitted a reimbursement request on February 4, 2025, which received an automated rejection.

10. Michigan United submitted a reimbursement request again on March 14, 2025, which received an automated rejection.


11. Michigan United has the full amount, \$300,000, left in the grant for services it has planned through September 30, 2025. Michigan United had been initially unable to draw any funds down for the first few months because of a government processing issue. After the issue was resolved, it ran into further issues drawing from the grant after the Legal Services Director suddenly resigned and new staff had to be trained. As an emergency measure, the organization had been subsidizing the funds out-of-pocket, with the expectation that it would finally draw the full reimbursement amount this reporting period. This means that the sudden inability to draw funds has had an even more devastating impact, as it has not been reimbursed for over a year’s worth of expenses.

12. The freeze has had immediate consequences. We have been forced to subsidize the citizenship classes to stay afloat short-term. But the CINAS grant is the core grant funding the legal services program. It pays the salary of three full-time staffers in the legal services department,

as well as two part-time instructor stipends. If the freeze is not lifted, we may have to terminate some or all of these positions. At that point, we may also have to close the citizenship classes and even the legal services program entirely.

13. The freeze will also cause significant reputational harm to Michigan United. We have spent years carefully building credibility with underserved, low-income communities in Detroit and Grand Rapids as a reliable service provider. Suddenly shutting off our services will damage this reputation, and leave a significant vacuum in the low-income Michigan community.

Detroit, Michigan
March 21, 2025


Ken Whittaker (Mar 21, 2025 16:38 EDT)

Ken R. Whittaker

EXHIBIT I

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Solutions in Hometown Connections, et al.,

Plaintiffs,

v.

Kristi Noem, et al.,

Defendants.

Civil Action No. 8:25-cv-00885-LKG

DECLARATION OF CATHRYN MILLER-WILSON, HIAS PENNSYLVANIA

I, Cathryn Miller-Wilson, declare under penalty of perjury, under 28 U.S.C. § 1746, that the following is true and correct:

1. I am the Executive Director of the Hebrew Immigrant Aid Society and Council Migration Service of Philadelphia, doing business as “HIAS Pennsylvania” or “HIAS PA.” I have held that position since November 1, 2016, and prior to that I served as Deputy Director since July 2014. In my role as Executive Director, I manage and oversee staffing and activities for all our immigrant service programs, including the naturalization services we provide pursuant to the Citizenship Instruction and Naturalization Application Services (“CINAS”) Grant. This grant comes to us via Defendant U.S. Citizenship and Immigration Services’ (“USCIS”) Citizenship and Integration Grant Program (“CIGP”). I also have personal knowledge of the factual statements contained herein.

2. HIAS PA is a 501(c)(3) nonprofit organization based in Philadelphia, Pennsylvania, helping immigrants and refugees access both legal and social services on a low-cost basis.

3. Our mission is to address these populations' needs, defend their rights, and advocate for their equitable inclusion in American society. Among other services, HIAS PA offers immigration legal services to immigrant communities in areas that include domestic violence, asylum applications, and accessing other benefits for which they are eligible, English as a Second Language ("ESL") classes, employment orientation services, health and wellness services, and resettlement support to immigrants and refugees. For lawful permanent residents ("LPR") looking to naturalize, we provide direct legal representation for naturalization applications and interviews and offer citizenship education through a strong network of partner organizations. HIAS PA has been conducting its naturalization work with the support of the CINAS grant almost every year since 2012 and has been a leader in providing these services for decades.

4. HIAS PA applied for, and again received a CINAS grant from Defendant USCIS pursuant to the funds appropriated by Congress for Fiscal Year 2023. The FY2023 CINAS grant is for \$450,000 over a two-year period to provide, at a minimum, citizenship classes to more than 200 enrolled LPRs, screen 200 LPRs for naturalization eligibility (with a stated goal of 350), and file naturalization applications (Form N-400) for 200 LPRs. The FY2023 CINAS grant has a performance period from October 1, 2023, through September 30, 2025. The Notice of Award for the FY2023 CINAS grant included a provision stating that "2 CFR Part 200" of the "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Award," is "incorporated into this Award by this reference."

5. HIAS PA, per the terms of our FY2023 CINAS grant, submits to Defendant USCIS quarterly reports on the required performance metrics. HIAS PA generally receives positive

feedback from Defendant USCIS on our performance metrics under the FY2023 CINAS grant, including outperforming expectations on the number and outcomes of students enrolled in citizenship classes.

6. Generally, HIAS PA has sought and continues to seek reimbursement from our award funds on a quarterly basis only for services and expenses as permitted by the terms of our FY2023 CINAS grant. This includes expenses and costs associated with providing naturalization application services and citizenship instruction. HIAS PA does not use FY2023 CINAS grant funds for other types of immigrant services provided by us, to help clients pay USCIS fees, food or refreshment, lobbying, or any other prohibited purpose.

7. On February 4, 2025, HIAS PA was sent an email signed by Jane Somerville, USCIS Grants Branch Chief, from the CitizenshipGrantProgram@uscis.dhs.gov email address and attaching a letter from Mary Jane Sommerville (referred to herein as the “Freeze Letter”). The Freeze Letter stated that, “[p]ursuant to the Department of Homeland Security Secretary Kristi Noem’s memorandum dated January 28, 2025, and effective immediately, your grant from U.S. Citizenship & Immigration Services is frozen.” The Freeze Letter noted that “payments are not available at this time,” and that USCIS “recognize[d] this will have an impact on your organization” but was “unable to provide a timeline on this freeze.”

8. The grant freeze had immediate and devastating financial consequences for HIAS PA. As a direct result of the funding freeze, HIAS PA had to reallocate our limited unrestricted funds from other programs to cover the expenses of the dedicated attorney representing LPRs in their naturalization process. We have assessed that there is an ethical obligation to continue representing these clients, and accordingly, we have had no choice but to draw from general funds that are not ordinarily allotted for naturalization work in order these expenses. As a result of this

reallocation, HIAS PA is currently operating on only 90 remaining days of payroll, after which we will be forced to lay off staff unless we are able to again obtain reimbursements from Defendants or are able to secure additional funding through private donations.

9. From their FY2023 CINAS grant, HIAS PA also subgrants to five other organizations to provide civics and English language instruction pursuant to the terms of the grant. HIAS PA handles the overall grant management, including filing quarterly invoices and performance reports that includes the FY2023 CINAS grant-related work performed by these organizations and reimbursing them accordingly. HIAS PA had to inform these subgrantees that it will be unable to pay them for their services going forward unless HIAS PA was able to obtain reimbursements from Defendants per the terms of the grant award. Without payment from HIAS PA, the subgrantees have stated they will be able to continue to provide services for the first quarter of 2025 but have not been able to confirm that they will be able to continue providing services into the next financial quarter.

10. HIAS PA has \$162,507.16 remaining on its FY2023 CINAS grant for services it has planned through September 30, 2025. Because the Freeze Letter and email initially went into a spam folder, HIAS PA requested a disbursement of grant funding on February 12, 2025, and was able to draw down enough funds to cover its expenses incurred through January 2025. In reliance on our FY2023 CINAS grant award, we continue to expend money on the services we are required to perform to meet the performance requirements of the grant. This includes an additional \$46,630 in costs we have already incurred during our continued performance of the FY2023 CINAS grant terms. We will need to submit additional vouchers for this work and the ongoing work throughout the remaining performance period.

11. We have attempted several times, including most recently on March 13, 2025, to ascertain from Defendant USCIS when the freeze will be lifted with no response. We would normally submit an invoice for these expenses in April and would submit two more through the remainder of the performance period. Without the FY2023 CINAS grant, HIAS PA will incur an estimated budget deficit of \$123,505 which does not include the \$39,002.16 that we would owe to our partners on this grant.

12. As a direct result of this funding freeze, HIAS PA is in the impossible position of having to decide whether to continue providing services in compliance with the terms of the FY2023 CINAS grant and incur costs that may never be reimbursed, or cut services and risk violating the terms of our FY2023 CINAS grant, thus imperiling the remainder of our grant funds if USCIS lifts the freeze. Our lead attorney and her staff who provide naturalization services under the grant are still accepting new clients, incurring additional costs, to continue complying with our grant terms. If we are forced to cut services, HIAS PA may be subject to termination of the FY2023 CINAS grant for failure to comply with the terms. Pursuant to the terms of our FY2023 CINAS grant, any termination would then be posted on the System for Award Management website (SAM.gov). HIAS PA is registered as a grantee on SAM.gov and it is where we submit our performance reports. As such, SAM.gov is used to track and manage our grant performance. A reporting of a termination of the FY2023 CINAS grant on SAM.gov could risk HIAS PA's future eligibility for grants.

13. As a result of the grant freeze, HIAS PA has engaged in contingency planning to determine how many layoffs would need to be implemented in the coming quarter. This planning in and of itself has taken away valuable time from the direct services work we are still attempting to provide to our LPRs, refugees, and other immigrants. We have, and are, discussing how we

continue to fulfill our mission as an organization without the funding from the grant and whether the communities we serve will have any other place to turn to.

14. We have invested in providing these services to the Philadelphia immigrant community for decades and continue to build nascent relationships with communities who are traditionally hard to reach. We would damage our reputation as the go-to organization for naturalization services in the Philadelphia area if we can no longer provide services. Many of our clients have paid USCIS a naturalization application fee, and HIAS PA and our subgrantees are helping them with the remainder of their naturalization process with services that include citizenship and language classes. These clients will lose trust in our efficacy and reliability when, as a result of the grant freeze, their citizenship or language classes are suddenly cancelled, or they are no longer able to receive help with the remainder of the naturalization process.

15. Without the services provided by HIAS PA and our five civics and English language services subgrantee organizations, to the best of my knowledge there is no other organization who could provide a comparable level of services to the same population. HIAS PA serves LPRs whose income is between 187%to 300 percent below the federal poverty guidelines. Seeking the assistance of private attorneys for legal representation for the naturalization process would be prohibitively expensive for most of HIAS PA's population of clients. As a result of the funding freeze, this community in the Philadelphia area would be left without access to the civics and English language instruction and legal representation that enable them to successfully naturalize.

Philadelphia, Pennsylvania
March 19, 2025



Cathryn Miller-Wilson

EXHIBIT J

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Solutions in Hometown Connections, et al.,

Plaintiffs,

v.

Kristi Noem, et al.,

Defendants.

Civil Action No. 8:25-cv-00885-LKG

DECLARATION OF TRACY ROY, IMMIGRANT LAW CENTER OF MINNESOTA

I, Tracy Roy, declare under penalty of perjury, under 28 U.S.C. § 1746, that the following is true and correct:

1. I am the Legal Director at Immigrant Law Center of Minnesota (“ILCM”). I have held that position since 2025. Prior to that, I served as the Pro Bono Manager at ILCM since 2023, after spending almost seven years building my career in immigration law. In my role as Legal Director, I lead the organization’s efforts to expand access to legal representation for immigrant communities in Minnesota. I also have personal knowledge of the factual statements contained herein.

2. ILCM is a Saint Paul, Minnesota-based 501(c)(3) nonprofit organization providing free legal representation to low-income immigrants and refugees in Minnesota since becoming an independent organization in 1996, and to refugees in North Dakota since opening our Fargo office in 2022. We are Minnesota’s only statewide provider of free comprehensive immigration legal

representation to low-income clients. ILCM's mission is to enhance opportunities for immigrants and refugees through free legal representation for low-income individuals and conduct both education and advocacy with a wide array of communities.

3. ILCM represents applicants for U.S. citizenship, current recipients of Deferred Action for Childhood Arrivals ("DACA"), refugees and asylees seeking permanent residency, and other noncitizens—including noncitizen survivors of human trafficking, abuse or domestic violence, and other certain violent crimes. ILCM also screens lawful permanent residents ("LPR") for naturalization eligibility and helps eligible LPRs seeking naturalization with preparing application materials. Since 2013, ILCM has received the Citizenship Instruction and Naturalization Application Services ("CINAS") Grant via Defendant U.S. Citizenship and Immigration Services' ("USCIS") Citizenship and Integration Grant Program ("CIGP") to fund this work. During the FY2022 grant period, ILCM enrolled 122 students in citizenship classes through our subgrantee, screened over 300 individuals for naturalization eligibility, and assisted 225 individuals to submit their N-400 form for naturalization.

4. ILCM applied for, and again received, a CINAS grant from Defendant USCIS pursuant to the funds appropriated by Congress for Fiscal Year 2024. The FY2024 CINAS grant is for \$283,018 to provide citizenship instruction to 200 LPRs, administer naturalization eligibility screenings to 224 LPRs, and file 200 naturalization applications. The FY2024 CINAS grant funds portions of eleven ILCM employees' work, covering both the legal team and the administrative staff. As part of meeting the performance metrics of the FY2024 CINAS Grant, ILCM also works with one main subgrantee to provide naturalization education, including citizenship classes. The FY2024 CINAS grant has a performance period from November 22, 2024 through September 30, 2026. The Notice of Award for the FY2024 CINAS grant included a provision stating that "2 CFR

Part 200” of the “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Award,” is “incorporated into this Award by this reference.”

5. ILCM, per the terms of our FY2024 CINAS grant, submits to Defendant USCIS quarterly performance reports, including reports from our subgrantee, on the required performance metrics. ILCM generally received positive feedback from Defendant USCIS on our performance metrics under prior grant awards.

6. Generally, ILCM has sought and continues to seek reimbursement from our award funds on a quarterly basis only for services and expenses as permitted by the terms of our FY2024 CINAS grant. This includes expenses and costs associated with providing naturalization application services and citizenship instruction. ILCM does not use FY2024 CINAS grant funds for other types of immigration services provided by us, to help clients pay USCIS filing fees, for food or refreshments, lobbying, or any other prohibited purpose.

7. On January 28, 2025, ILCM submitted an invoice in the federal Payment Management System (“PMS”) portal for the last quarter of its previous 2022 grant (for which we had received an extension) and for the first quarter (November 22, 2024, through December 31, 2024) of the FY2024 CINAS grant. ILCM received the payment for the FY2024 grant invoice on January 30, 2025, and the payment for the FY2022 grant invoice on February 4, 2025.

8. On February 4, 2025, ILCM received an email signed by Jane Somerville, USCIS Grants Branch Chief, from the CitizenshipGrantProgram@uscis.dhs.gov email address with an attached letter from Mary Jane Sommerville (referred to herein as the “Freeze Letter”). The Freeze Letter stated that, “[p]ursuant to the Department of Homeland Security Secretary Kristi Noem’s memorandum dated January 28, 2025, and effective immediately, your grant from U.S. Citizenship & Immigration Services is frozen.” The Freeze Letter noted that “payments are not available at

this time,” and that USCIS “recognize[d] this will have an impact on your organization” but was “unable to provide a timeline on this freeze.”

9. We have never received anything like this freeze letter in the 11 years we have been working under the CINAS grant. Due to the grant freeze, the organization has been using our limited unrestricted funds meant for other services to finance ILCM’s naturalization services. This has been challenging because much of our other funding also comes from purpose-restricted grants, such as those specifically meant for refugees. For example, one of our refugee resettlement grants has recently restricted who we can assist with naturalization services to refugees 65 and older, further decreasing the pot of funds we could draw on and reallocate to cover the work that is ordinarily funded by the CINAS grant.

10. As a direct result of the DHS funding freeze, ILCM has been forced to rely more fully on pro bono services that are unsustainable at the current rate of service to continue providing legal representation to LPRs applying for naturalization. Based on our current budgetary planning, if the funding is not restored, staff currently providing legal representation services to LPRs applying for naturalization will likely need to cut back on those services in the subsequent quarters of 2025. ILCM is currently assessing exactly how many staff will ultimately need to be cut without restored funding.

11. We immediately stopped funding our subgrantee organization upon receiving the Freeze Letter. As a result, they have already cut down their number of citizenship classes from four to only one, serving only 25 to 40 students instead of the 75 to 100 as planned, and are no longer able to offer instructional support to its citizenship class teachers. Our subgrantee has been forced to shift to relying on volunteer services for one-on-one tutoring for any students who cannot attend the one citizenship class they are limited to offering. These classes are currently being

funded through other means and are likely operating at a loss. The subgrantee has also cut its planned outreach to promote the citizenship class, further reducing how many eligible LPRs it can reach to enroll. This change in our combined services is a direct result of the freeze.

12. ILCM has \$272,515 remaining on its FY2024 CINAS grant for services it has planned through September 30, 2026. In reliance on our FY2024 CINAS grant award, we expend and continue to expend money on the services we are required to perform to meet the performance requirements of the grant. This includes costs of \$19,371 that ILCM has already incurred in the course of our continued performance of the FY2024 CINAS grant terms as of March 13, 2025. We will need to submit additional vouchers for this work and the ongoing work throughout the remaining performance period.

13. ILCM has attempted, most recently on March 12, 2025, to ascertain when the freeze will be lifted with no response. For all the years we have received the CINAS grant, we have had consistent communication from our USCIS grants officer. The lack of communication since the Freeze has been jarring. We would normally submit an invoice for these expenses in April, on a quarterly basis, and would continue to submit an additional six invoices through the remainder of the performance period. Without the FY2024 CINAS grant, ILCM is estimated to be operating on a \$45,000 budget deficit for the 2025 fiscal year.

14. As a direct result of this funding freeze, ILCM is in the impossible position of having to decide whether to continue providing services in compliance with the terms of the FY2024 CINAS grant and incur costs that may never be reimbursed, or cut services and risk violating the terms of our FY2024 CINAS grant, thus imperiling the remainder of our grant funds if USCIS lifts the freeze. If we are forced to further cut services, ILCM may be subject to termination of the FY2024 CINAS grant for failure to comply with the terms. Pursuant to the terms


of our FY2024 CINAS grant, any termination would then be posted on the System for Award Management website (SAM.gov). ILCM is registered as a grantee on SAM.gov and a reporting of a termination of the FY2024 CINAS grant on SAM.gov could risk ILCM's future eligibility for grants.

15. Our leadership team has been engaged in contingency planning in the event our FY2024 CINAS grant funds are not restored. This planning itself has taken valuable time away from our ordinary direct services work and is causing unprecedented amounts of stress and uncertainty for all our employees. We have been forced to plan for layoffs or other means to reduce staff hours or cut staff and try to develop appropriate criteria to make those decisions.

16. We are now forced to assess how we can fulfill our mission to enhance opportunities for immigrants and refugees without this funding and how the communities we serve will be able to access representation. ILCM has invested 29 years in building our reputation as a top provider of services to the immigrant communities in Minnesota and North Dakota. We work closely with community partners, and it would irreparably damage our relationships if we were forced to turn people away. Directly in line with our mission to serve low-income individuals, many of our clients are eligible for and request a fee waiver from USCIS when they file for naturalization. Fee waiver requests require an extra level of expertise as these waivers are often rejected for technical errors and clients are often unsuccessful when filing on their own. ILCM and our subgrantee help our clients with the naturalization process with services that include filing the fee waiver and naturalization applications, and citizenship and language classes. These vulnerable clients will lose trust in our efficacy and reliability when, as a result of the grant freeze, their citizenship or language classes are suddenly cancelled, or their legal representation is interrupted by staffing changes and lower capacity.

17. Without ILCM's services, LPRs in Minnesota and in rural areas in particular, would be left with few options to secure access to civics education and legal representation at an affordable cost, and would functionally lose access to this assistance in the naturalization process, endangering their ability to successfully naturalize.

St. Paul, Minnesota
March 19, 2025



Tracy Roy

EXHIBIT K

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Solutions in Hometown Connections, et al.,

Plaintiffs,

v.

Kristi Noem, et al.,

Defendants.

Civil Case No. 8:25-cv-00885-LKG

DECLARATION OF KARINA AYALA-BERMEJO

I, Karina Ayala-Bermejo, declare under penalty of perjury, under 28 U.S.C. § 1746, that the following is true and correct:

1. I am the President and CEO of Instituto del Progreso Latino. I have held that position for the past seven and a half years. In my role as President and CEO, I oversee all aspects of the organization. This declaration is based on my firsthand knowledge of the facts as stated here.

2. Instituto del Progreso Latino (IDPL) is a leading community-based organization that contributes to the development of Latino immigrants through education, training, and employment to foster full participation in the U.S. while preserving cultural identity and dignity.

3. The organization conducts various programs, including English, Citizenship, and Adult Education courses. IDPL provides services to all community members free of cost.

4. Presently, IDPL is the largest processor of citizenship applications in the state of Illinois and with 30,000 new lawful permanent residents in the state each year, the need for IDPL's services is profound.

5. In October 2023, IDPL applied for, and received, a CINAS Grant via Defendant U.S. Citizenship and Immigration Services' ("USCIS") Citizenship and Integration Grant Program ("CIGP"). This grant was for \$450,000 to provide legal screening eligibility for 600 LPRs, citizenship instruction to 420 LPRs, and naturalization-application services to 325 LPRs. The FY2023 CINAS grant has a performance period from October 1, 2023, through September 30, 2025. The grant award letter that we received included a provision stating that "2 CFR Part 200," the "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Award," is "incorporated into this Award by this reference."

6. On February 4, 2025, IDLP received an email sent from the CitizenshipGrantProgram@uscis.dhs.gov email address and signed by Jane Somerville, USCIS Grants Branch Chief, attaching a letter from Mary Jane Sommerville (referred to herein as the "Freeze Letter"). The Freeze Letter stated that, "[p]ursuant to the Department of Homeland Security Secretary Kristi Noem's memorandum dated January 28, 2025, and effective immediately, your grant from U.S. Citizenship & Immigration Services is frozen." The Freeze Letter noted that "payments are not available at this time," and that USCIS "recognize[d] this will have an impact on your organization" but was "unable to provide a timeline on this freeze."

7. This freeze had immediate and devastating financial consequences for IDLP, its employees, and the community members served. As a direct result of the funding freeze, IDPL has been forced to reallocate other independent agency funding to cover the existing naturalization programs. If the CINAS funds remain frozen, the organization will likely be forced to switch to a fee-structured program, in stark contrast with its current free program service delivery model. Moreover, without such funds, IDPL no longer has the ability to provide classes, books, and materials for 200 students. In addition, the organization has also had to cancel future appointments

for screening services, no longer has the capacity to provide 225 legal screenings for the remainder of the grant period, and will not be able to submit 150 completed naturalization applications as the grant contemplates. IDPL will lose 1 full-time and 4 part-time staff members if this funding is not immediately restored.

8. IDPL has \$145,507.57 remaining on its CINAS grant for services it has planned through September 30, 2025. It expends money on these services and submits quarterly vouchers to USCIS for reimbursement.

9. IDPL submitted a voucher on February 19, 2025, for \$12,416 for its January expenses but has not received the funds. IDPL would in the ordinary course of business submit two additional vouchers through the remainder of the current performance period.

10. As a direct result of this USCIS funding freeze, IDPL must decide whether to immediately cut program services and risk violating the terms of our CINAS grant, imperiling the remainder of the grant funds if the freeze is lifted but we cannot meet the grant terms, or to maintain existing services and risk not being reimbursed for them. This grant continues a longstanding, 15-year administrative and programmatic relationship between IDPL and USCIS.

11. The funding freeze denies the immigrant community that IDPL serves in Chicago access to these services at one of the most critical periods for individuals seeking citizenship.

Chicago, IL
March 20, 2025


Karina Ayala-Bermejo

EXHIBIT L

**The U.S. Department of Homeland Security (DHS)
Notice of Funding Opportunity (NOFO)
FY 2023 Citizenship and Integration Grant Program
Citizenship Instruction and Naturalization Application Services**

All entities wishing to do business with the federal government must have a unique entity identifier (UEI). The UEI number is issued by the SAM system. Requesting a UEI (Sam.gov) information can be found at: <https://sam.gov/content/entity-registration>.

Grants.gov registration information can be found at:
<https://www.grants.gov/web/grants/register.html>.

Planned UEI Updates in Grant Application Forms

On April 4, 2022, the Data Universal Numbering System (DUNS) Number was replaced by a new, non-proprietary identifier requested in, and assigned by, the System for Award Management (SAM.gov). This new identifier is the Unique Entity Identifier (UEI). Additional Information can be found on Grants.gov: <https://www.grants.gov/web/grants/forms/planned-uei-updates.html>

A. Program Description

1. Issued By

U.S. Department of Homeland Security (DHS), U.S. Citizenship and Immigration Services (USCIS), External Affairs Directorate (EXA), Office of Citizenship, Partnership and Engagement (OCPE)

2. Assistance Listings Number

97.010

3. Assistance Listings Title

Citizenship Education and Training

4. Funding Opportunity Title

FY 2023 Citizenship and Integration Grant Program: Citizenship Instruction and Naturalization Application Services (CINAS)

5. Funding Opportunity Number

DHS-23-CIS-010-002

6. Authorizing Authority for Program

H.R. 2617 – Consolidated Appropriations Act, 2023 (Pub. L. 117-328) Division F, Title IV

7. Appropriation Authority for Program

H.R. 2617 – Consolidated Appropriations Act, 2023 (Pub. L. 117-328) Division F, Title IV

8. Announcement Type

Initial

9. Program Overview, Objectives, and Priorities**a. Overview**

OCPE is charged with promoting instruction and training on the rights and responsibilities of citizenship. USCIS recognizes that naturalization is a key milestone in the civic integration of immigrants. Naturalization requirements, such as knowledge of English and U.S. history and government, encourage civic learning and build a strong foundation upon which immigrants can fully integrate into American society. Through preparing for naturalization, immigrants gain tools to become successful citizens and meet their responsibilities as United States citizens.

The goal of the Citizenship and Integration Grant Program is to expand the availability of high-quality citizenship preparation services for lawful permanent residents (LPRs) across the nation and to provide opportunities for immigrants to gain the knowledge and skills necessary to integrate into the fabric of American society.

Since it began in 2009, the Citizenship and Integration Grant Program has awarded more than \$132 million through 579 competitive grants to immigrant-serving organizations in 39 states and the District of Columbia. Now in its 15th year, the program has helped more than 300,000 LPRs prepare for citizenship. The Citizenship and Integration Grant Program supports the objectives of [Executive Order 14012, Restoring Faith in Our Legal Immigration Systems and Strengthening Integration and Inclusion Efforts for New Americans](#) and the U.S. Department of Homeland Security's [Strategic Plan for Fiscal Years 2020-2024](#), by promoting integration, inclusion, and citizenship. Furthermore, the goals of the Citizenship and Integration Grant Program address the DHS mission to enforce and administer our immigration laws (captured in the [Third Quadrennial Homeland Security Review](#)) and [USCIS' mission and values](#), as the program provides immigrants instruction on the rights and responsibilities of U.S. citizenship and information and support on how to apply for naturalization within the authorized practice of immigration law.

The *Citizenship Instruction and Naturalization Application Services (CINAS)* funding opportunity provides support to organizations that offer citizenship preparation services to LPRs. Additional activities that support this goal include identifying, implementing, and sharing best practices in citizenship preparation; increasing the use of and access to technology in citizenship preparation programs; working with local libraries and museums which serve as vital resources for immigrant communities; and incorporating strategies to foster welcoming communities as part of the citizenship and civic integration process.

b. Objectives

In fiscal year (FY) 2023, approximately \$16.5 million in federal funding is available for

eligible organizations to provide direct citizenship preparation services to LPRs through this funding opportunity. USCIS anticipates awarding up to 55 grants of up to \$300,000 each.

Proposed services **must** include the following two components:

1.) Citizenship Instruction Services:

Educational services that provide enrolled LPRs with the skills and knowledge needed to prepare for citizenship, including instruction in English as a Second Language (ESL), U.S. history and government, and the naturalization process.

2.) Naturalization Application Services:

Within the scope of the authorized practice of immigration law, grant recipients must assist qualified program participants in preparing and submitting Form N-400, Application for Naturalization, preparing for the naturalization interview, and providing ongoing case management as needed.

For detailed information on the two mandatory program components, see below Section C.2, Eligibility Information.

Partnerships

Partnerships are encouraged. Applicants may include partnerships with other public or non-profit organizations in their proposal. The principal applicant must directly provide either citizenship instruction or naturalization application services, or both. A partner organization is a “subrecipient” if the organization will receive a portion of the grant funding to provide additional or complementary direct citizenship instruction or naturalization application services.

The principal applicant must complete a Memorandum of Understanding (MOU) with the prospective subrecipient and submit it with the application. The principal applicant must clearly demonstrate how it will monitor the prospective subrecipient’s performance and ensure that the prospective subrecipient complies with all grant award conditions and data reporting requirements. The MOU must state the minimum number of students to whom the subrecipient will provide services and how grant funding will be allocated to fund the services. Prospective subrecipients must have their own individual UEI number and will be responsible for financial and performance reporting. Subrecipients must submit their reports to the principal applicant for submission to DHS.

If the principal applicant partners with an organization that does not receive a portion of the grant funding, the principal applicant should still complete an MOU. However, the principal applicant does not need to include the other required information listed above for subrecipients and the partner organization does not need an individual UEI.

10. Performance Measures

For this grant program, performance will be evaluated based on the following metrics:

- a. Cumulative percentage of enrolled students who post-test using nationally normed standardized tests of English language proficiency (minimum goal of 80%);
- b. Cumulative percentage of post-tested students demonstrating measurable educational gains (minimum goal of 80%); and
- c. Three performance metrics for which the minimum goals vary based on funding level, as described in the chart below:
 - 1.) Number of newly enrolled non-duplicated LPRs in citizenship instruction classes;
 - 2.) Number of LPRs for whom your organization will provide naturalization eligibility screening;
 - 3.) Number of LPRs for whom your organization will prepare and file a Form N-400, Application for Naturalization, and Form G-28, Notice of Entry of Appearance as Attorney or Accredited Representative.

Minimum Performance Goals for Two-Year Period of Performance				
Funding Level		Newly enrolled non-duplicated LPRs in citizenship classes	LPRs receiving naturalization eligibility screening	LPRs filing Forms N-400 and G-28
from	To			
\$270,000	\$300,000	200	200	200
\$240,000	\$269,999	180	180	180
\$210,000	\$239,999	160	160	160
\$180,000	\$209,999	140	140	140
\$150,000	\$179,999	120	120	120

B. Federal Award Information

1. **Available Funding for the NOFO:** \$16,500,000
2. **Projected Number of Awards:** 55
3. **Maximum Award Amount:** \$300,000
4. **Period of Performance:** 24 months

Note: extensions are permitted. See Section H, Additional Information, Period of Performance Extensions, for more information.

5. **Projected Period of Performance Start Date:** 10/01/2023
6. **Projected Period of Performance End Date:** 09/30/2025

7. Funding Instrument Type:

Grant

C. Eligibility Information**1. Eligible Applicants**

The following entities are eligible to apply to this announcement:

- a. County governments
- b. City or township governments
- c. Special district governments
- d. Independent school districts
- e. Public or state-controlled institution of higher education
- f. Indian/Native American tribal governments (federally recognized)
- g. Indian/Native American tribal organizations (other than federally recognized)
- h. Indian/Native American Tribally Designated Organizations
- i. Public/Indian Housing Authority
- j. Nonprofits with 501(c)(3) IRS status, other than institutions of higher education
- k. Special district governments
- l. State governments

2. Applicant Eligibility Criteria

Applicants must demonstrate experience with, and extensive knowledge of, the community they propose to serve and should describe how the proposed program design will address the specific needs of this community. Through citizenship instruction and naturalization application services, the LPRs served under the program will gain skills and knowledge required to become successful citizens.

Applicants and any proposed subrecipients **must** demonstrate recent experience with the provision of citizenship preparation services. Specifically, at least one year of experience within the past three years:

- a. Providing citizenship instruction in a classroom setting that follows a curriculum and utilizes a textbook; and
- b. Preparing and filing Forms N-400 and G-28 on behalf of qualified LPRs and within the authorized practice of immigration law. See Appendix D for definitions of these terms.

Proposed services **must** include the following two mandatory components:

- a. **Citizenship Instruction Services** to prepare LPRs for the naturalization process. Programs must include:

1.) Citizenship Instruction, which must include the following content areas:

- a.) ESL instruction in reading, writing, and speaking;
- b.) U.S. history and government instruction delivered in English for test preparation and the promotion of civic integration,¹ and
- c.) The naturalization process and eligibility interview, with instruction delivered in English.

2.) Course Curriculum, which must include all components outlined in the [USCIS Guide to Creating an Adult Citizenship Education Curriculum](#):

- a.) Instruction in U.S. history and government for test preparation and the promotion of civic integration;
- b.) Activities that promote civic and linguistic integration;
- c.) ESL instruction in reading, writing, and speaking for the naturalization test, naturalization process, and to conduct required integration activities;
- d.) Instruction on the naturalization interview and Form N-400; and
- e.) Instruction on the rights and responsibilities of citizenship, including information on voting rights and responsibilities, how to register to vote after becoming a citizen, the basics of becoming an informed voter, and the penalties for voting before becoming a citizen under Division C of PL 104–208, 110 Stat. 3009-546.²

3.) Course Textbooks, which must align with the skill level of the students in the class:

- a.) Published hardcopy textbooks only, compilations of worksheets or handouts will not be accepted; and
- b.) All students must be issued a textbook for their own personal use to keep.

4.) Nationally Normed Standardized ESL Assessments, which must be used to place and assess progress of all students enrolled under this program, and verify that:

- a.) At least 80% of enrolled students participate in post-testing; and
- b.) At least 80% of post-tested students demonstrate educational gains as evidenced by increased standardized test scores.

USCIS provides grant recipients and subrecipients with free copies of the Assessment for Adult Citizenship Education (AACE). We strongly encourage but do not require recipients to use the AACE to assess civics learning gains in addition to the ESL assessment.

¹ Some instruction in languages other than English may be provided under the program to immigrants who qualify for exemptions to the English language naturalization requirements. Grant recipients who provide such instruction must still provide the minimum number of permanent residents with grant-funded citizenship instruction in English over the two-year period of performance.

² <https://www.congress.gov/104/plaws/publ208/PLAW-104publ208.pdf>

- 5.) Course Structure**, which must include at least 40 hours of citizenship instruction over a 9 to 12 week class cycle with managed enrollment to students at the National Reporting System (NRS) low beginning to advanced ESL levels (NRS Levels 2-6);
- a.) Students who pre-test at the NRS literacy level (1) are not eligible to participate in grant-funded classes;
 - b.) Additional information about NRS levels is available on the [National Reporting System for Adult Education](#) website; and
 - c.) Tutoring services do not count toward the minimum 40 hours of classroom instruction.
- 6.) Qualified Instructors:** Qualified citizenship instructors who have degrees in education (K-12 Social Studies, English Language Arts, History, Linguistics, Teaching English to Speakers of Other Languages (TESOL), or Adult Education) or who have at least one year of experience as the lead teacher in a class for adult immigrants. Although not a requirement, programs whose instructors have the following education, certification, and/or experience are generally more likely to be scored higher than programs that do not:
- a.) Hold a degree in TESOL;
 - b.) Hold TESOL certification from a state licensing agency; or
 - c.) Have a minimum of two years of experience in TESOL instruction in a classroom setting for an adult education program that utilizes a textbook and a structured curriculum.
- 7.) Integration Activities:** The intent of this requirement is to encourage students to extend knowledge acquisition beyond traditional classroom instruction through opportunities to experience and navigate American civic life firsthand through in-depth learning activities. Applicants are encouraged to draw upon their local resources, venues, and landmarks when conceptualizing and designing these civic integration learning activities. Suggested categories for the required integration activities include but are not limited to:
- a.) **Site-based civic integration activities:** Local trips outside the classroom to sites and landmarks of historical and/or cultural significance, libraries, museums, other local public entities, and organizations that promote public safety, etc.;
 - b.) **Classroom-based civic integration activities:** Activities that may involve guest speakers such as local civic leaders, public servants, or program alumni to provide the opportunity for student interaction and exchange, or the use of multimedia and/or materials-based methods that promote an enhanced understanding of key moments in U.S. history and/or the form and function of local, state, and federal government;
 - c.) **Civic participation:** Activities that encourage students to take participatory learning beyond the classroom by attending a public meeting, volunteering, or participating in local civic institutions; and
 - d.) **Other integration activities:** Activities that promote in-depth understanding of the student's role as a future citizen of the United States, including the rights and responsibilities of citizenship; our shared American history; government

functions, structure, and laws; geography; and traditions, symbols, and holidays. These can be external or in-class.

- 8.) Service Delivery:** Applicants are encouraged to primarily provide in-person instruction. However, applicants may propose to supplement in-person classes with virtual classes if it allows them to extend the reach of their services. Additionally, applicants should be prepared to pivot to virtual or hybrid instruction if public health restrictions limit in-person gatherings.

For more detailed information on the content and competencies that applicants are required to address in grant-funded classes, please review the [USCIS Guide to Creating an Adult Citizenship Education Curriculum](#) and the [Adult Citizenship Education Sample Curriculum for a High Beginning ESL Level Course](#).

- b. Naturalization Application Services,** within the scope of the authorized practice of immigration law, to support LPRs in the naturalization application and interview process. Grant recipients are encouraged to use and promote the use of [MyUSCIS](#) for filing Forms N-400. Programs must include:

1.) Qualified Legal Service Providers:

A qualified legal service provider includes one of the following:

- a.) A U.S. Department of Justice (DOJ) Accredited Representative serving a DOJ Recognized Organization. Partial accreditation is permitted; or
- b.) An attorney who is an employee of the applicant or the proposed subrecipient organization.
 - 1.) Attorneys working under this grant must have training in immigration law and be able to provide legal representation to clients.
 - 2.) Hours charged to the grant should be in alignment with the goals of the application.
 - 3.) Pro bono or volunteer attorneys may be used to supplement the program but may not:
 - i. Serve as the applicant's sole provider of immigration legal services; or
 - ii. Serve as a supervisor to staff members who provide naturalization application services but who are not qualified legal service providers.

The organization must demonstrate an established process to refer individuals with complex immigration matters beyond the scope of the services provided under this grant to a qualified attorney.

- 2.) Eligibility Screenings** must include an assessment of each program participant's:
- a.) Ability to meet the educational requirements of naturalization; and
 - b.) Ability to meet other legal requirements of naturalization.

For more information, see the [USCIS Naturalization Eligibility Worksheet](#).

3.) Case Management must include:

- a.) The preparation and submission of Form N-400, Application for Naturalization;³
- b.) The preparation and submission of Form G-28, Notice of Entry of Appearance as Attorney or Accredited Representative;⁴
- c.) Filing other related forms or documents (such as Form N-648, Medical Certification for Disability Exceptions and Form I-912, Request for Fee Waiver);
- d.) Interview preparation;
- e.) A representative's appearance at the naturalization interview when applicable⁵; and
- f.) Responding to any Requests for Evidence (RFEs) when applicable.

4.) Service Delivery: Organizations should plan to provide in-person naturalization application services. However, should public health restrictions limit the ability of applicants to offer in-person services, they should have a plan in place to pivot to virtual or hybrid naturalization application services.**3. Other Eligibility Restrictions**

For-profit law firms and attorneys in private practice are not eligible to receive funding under this funding opportunity (See the Glossary in Appendix B for the definitions of "representation" and "employee").

Applicants may apply to multiple funding opportunities, with exceptions noted below. USCIS reserves the right to only fund one award.

Current recipients and subrecipients under the FY 2022 Citizenship Instruction and Naturalization Application Services funding opportunity (DHS-22-CIS-010-002) are not eligible to apply. Similarly, nor are awardees under the Community and Regional Integration Network Grant Program (DHS-22-CIS-010-003).

Subrecipients to DHS-22-CIS-010-01 (Regional Hub Grants) are not eligible to receive funding under this funding opportunity. Regional Hub subrecipients may not separately apply as the

³ Grant recipients are strongly encouraged to file forms electronically whenever possible. In the case that e-filing is not a viable option, the grantee's legal service provider is required to mail the naturalization application package to USCIS on behalf of the client. Applications may not be given to the client to mail.

⁴ At grant-supported group processing events, a Form G-28 may not be required if the *pro bono* attorney filling out the Form N-400 determines that the services provided would not be considered "practice" or "preparation", as those terms are defined in 8 C.F.R.CFR 1.2. Such *pro bono* attorneys, however, will be required to complete the preparer section of the Form N-400.

⁵ Under the USCIS grant program, legal representatives are not required to attend all naturalization interviews. However, it is recommended that legal representatives attend interviews of clients who have a higher need for in-person representation.

principal applicant under any of the FY 2023 Citizenship and Integration Grant Programs, as subrecipients are potentially eligible for the Regional Hub grant based on their demonstrated need for capacity building and support developing or expanding citizenship education services.

Any applicant that does not possess the mandatory required minimum of one year experience in the past three years with *both* citizenship instruction and naturalization application services (independently or in partnership with a qualified potential subrecipient), is not eligible to receive funding under this funding opportunity.

Any applicant that does not propose offering both required services – citizenship instruction and naturalization application services (independently or in partnership with a qualified potential subrecipient), in accordance with the above-described programmatic requirements is not eligible to receive funding under this funding opportunity.

Any applicant that does not propose to achieve the minimum performance goals outlined in section A.10 of the funding opportunity announcement is not eligible to receive funding under this funding opportunity.

Any application that does not include all forms listed as required on the Applicant Checklist, located in Appendix B, is not eligible to receive funding under this funding opportunity.

If DHS determines at any point during the review process that an application does not meet these eligibility requirements, the application will be removed from further consideration.

Non-Responsive Applications

An application will be deemed non-responsive and will be removed from further consideration if:

- a. Form SF-424 – *Application for Federal Assistance* is missing.
- b. Form SF-424A – *Budget* is missing.
- c. Form SF-424B – *Assurances – Non-Construction Programs* is missing.
- d. The applicant's Authorized Organization Representative (AOR) is not registered in SAM.
- e. The application does not include a Budget Narrative and Budget Table.
- f. The application does not include a Project Narrative.

4. Cost Share or Match

There is a **minimum cost share requirement for this program of 10%** of the total requested funding amount. Applicants should clearly identify which budget items are to be supported by federal grant funding and which are to be supported by in-kind contributions and/or other funding sources, along with an estimate of the value of these non-federal funding sources. All proposed cost share contributions must be clearly described in the budget portion of the proposal. Applicants will be scored on this during the technical review.

Acceptable forms of cost share items include:

- Volunteer services: Rates for volunteer services must be consistent with those paid for similar work.
- Employee time: Employee's regular rate of pay.
- Supplies: Fair market value of the supplies at the time of donation.
- Cash contributions: Cash value.
- Equipment, building, or land: Fair market value or rental value at the time of application, as established by an independent appraisal.
- Project co-funding: Actual cost incurred.

D. Application and Submission Information

1. Key Dates and Times

- a. Application Start Date:** 06/09/2023
- b. Application Submission Deadline:** 07/28/2023 at 11:59PM EST
All applications must be received by the established deadline.
- c. Anticipated Award Date:** No later than 09/30/2023

NOTE: The application must be received in Grants.gov by the date and time listed above. If an application is received after the deadline, it will not be considered. Applicants will receive a confirmation from Grants.gov once the application is successfully submitted.

All applications are time stamped by the Grants.gov system when submitted and recipients are notified accordingly. The federal office will download all applications that are received by the deadline date and time as indicated on the NOFO. **Late applications will not be accepted.**

d. Other Key Dates

Event	Suggested Deadline for Completion
Initial Registration at SAM.gov (includes UEI issuance)	Four weeks before actual submission deadline
Obtaining UEI Number	Four weeks before actual submission deadline
Obtaining a valid EIN	Four weeks before actual submission deadline
Updating SAM registration	Four weeks before actual submission deadline
Starting application in Grants.gov	One week before actual submission deadline

2. Agreeing to Terms and Conditions of the Award

By submitting an application, applicants agree to comply with the requirements of this NOFO and the terms and conditions of the award, should they receive an award.

3. Address to Request Application Package

Application forms and instructions are available at Grants.gov. To access these materials, go to <https://www.grants.gov/> and select “Applicants” then “Apply for Grants.” To obtain the application package, select “Download a Grant Application Package.” Enter the Assistance Listing and/or funding opportunity number located on the cover of this NOFO, select “Download Package,” and then follow the prompts to download the application package.

For a hard copy of the full NOFO, please write or fax a request to:

Jacqueline Greely
Grants Officer
CISMailbox@hq.dhs.gov
Fax: 202-447-5600

If you use assistive technology and are unable to access any materials on Grants.gov, please email the Support Center at support@grants.gov.

Applications will be processed through the Grants.gov portal. If you experience difficulties accessing information or have any questions, please call 1-800-518-4726.

4. Unique Entity Identifier and System for Award Management (SAM)

Each applicant, unless they have a valid exception under 2 CFR 25.110, must:

- a. Be registered in Sam.Gov before application submission.
- b. Provide a valid unique entity identifier in its application.
- c. Continue to always maintain an active SAM registration with current information during the Federal Award process.

5. Steps Required to Submit an Application, Unique Entity Identifier, and System for Award Management (SAM)

To apply for an award under this program, all applicants must:

- a. Have an account with <https://login.gov/>;
- b. Register for, update, or verify their SAM account and ensure the account and EIN are active before submitting the application;
- c. Create a Grants.gov account;
- d. Add a profile to a Grants.gov account;
- e. Establish an Authorized Organizational Representative (AOR) in Grants.gov;
- f. Submit application in Grants.gov; and
- g. Continue to maintain an active SAM registration with current information, including information on a recipient’s immediate and highest-level owner and subsidiaries, as well on all predecessors that have been awarded a federal contract or grant within the last three years, if applicable, at all times during which it has an active federal award or an application or plan under consideration by a federal awarding agency.

Applicants are advised that DHS may not make a federal award until the applicant has complied with all applicable UEI and SAM requirements. Therefore, an applicant's SAM registration must be active not only at the time of application, but also during the application review period and when DHS is ready to make a federal award. Further, as noted above, an applicant's or recipient's SAM registration must remain active for the duration of an active federal award. If an applicant's SAM registration is expired at the time of application, expires during application review, or expires any other time before award, DHS may determine that the applicant is not qualified to receive a federal award and use that determination as a basis for making a federal award to another applicant.

6. **Electronic Delivery**

DHS is participating in the Grants.gov initiative to provide the grant community with a single site to find and apply for grant funding opportunities. DHS encourages or requires applicants to submit their applications online through Grants.gov, depending on the funding opportunity. For this funding opportunity, DHS requires applicants to submit applications through Grants.gov.

7. **How to Register to Apply through Grants.gov**

Instructions: Registering in Grants.gov is a multi-step process. Read the instructions below about registering to apply for DHS funds. Applicants should read the registration instructions carefully and prepare the information requested before beginning the registration process. Reviewing and assembling the required information before beginning the registration process will alleviate last-minute searches for required information.

The registration process can take up to four weeks to complete. Therefore, registration should be done in sufficient time to ensure it does not impact your ability to meet required application submission deadlines.

Organizations must have a Unique Entity Identifier (UEI) Number with an active System for Award Management (SAM) registration, and Grants.gov account to apply for grants. If individual applicants are eligible to apply for this grant funding opportunity, then you may begin with step 3, Create a Grants.gov account, listed below.

Creating a Grants.gov account can be completed online in minutes, but UEI and SAM registrations may take several weeks. Therefore, an organization's registration should be done in sufficient time to ensure it does not impact the entity's ability to meet required application submission deadlines. Complete organization instructions can be found on Grants.gov here: <https://www.grants.gov/web/grants/applicants/organization-registration.html>.

- a. *Register with SAM:* All organizations applying online through Grants.gov must register with the System for Award Management (SAM). Failure to register with SAM will prevent your organization from applying through Grants.gov. SAM registration must be renewed annually.

For more detailed instructions for registering with SAM, refer to:

<https://www.grants.gov/web/grants/applicants/organization-registration/step-2-register-with-sam.html>.

- b. *Create a Grants.gov Account:* The next step is to register an account with Grants.gov. Follow the on-screen instructions or refer to the detailed instructions here:
<https://www.grants.gov/web/grants/applicants/registration.html>.
- c. *Add a Profile to a Grants.gov Account:* A profile in Grants.gov corresponds to a single applicant organization the user represents (i.e., an applicant) or an individual applicant. If you work for or consult with multiple organizations and have a profile for each, you may log in to one Grants.gov account to access all of your grant applications. To add an organizational profile to your Grants.gov account, enter the UEI Number for the organization in the UEI field while adding a profile.

For more detailed instructions about creating a profile on Grants.gov, refer to:

<https://www.grants.gov/web/grants/applicants/registration/add-profile.html>.

- d. *Ebiz POC Authorized Profile Roles:* After you register with Grants.gov and create an Organization Applicant Profile, the applicant's request for Grants.gov roles and access is sent to the Ebiz POC. The Ebiz POC will then log in to Grants.gov and authorize the appropriate roles, which may include the AOR role, thereby giving you permission to complete and submit applications on behalf of the organization. You will be able to submit your application online any time after you have been assigned the AOR role.

For more detailed instructions about creating a profile on Grants.gov, refer to:

<https://www.grants.gov/web/grants/applicants/registration/authorize-roles.html>.

- e. *Track Role Status:* To track your role request, refer to:
<https://www.grants.gov/web/grants/applicants/registration/track-role-status.html>.
- f. *Electronic Signature:* When applications are submitted through Grants.gov, the name of the organization applicant with the AOR role that submitted the application is inserted into the signature line of the application, serving as the electronic signature. The Ebiz POC **must** authorize people who are able to make legally binding commitments on behalf of the organization as a user with the AOR role; **this step is often missed, and it is crucial for valid and timely submissions.**

8. How to Submit an Application to DHS via Grants.gov

Grants.gov applicants can apply online using Workspace. Workspace is a shared, online environment where members of a grant team may simultaneously access and edit different webforms within an application. For each NOFO, you can create individual instances of a Workspace.

Below is an overview of applying on Grants.gov. For access to complete instructions on how to apply for opportunities using Workspace, refer to:

<https://www.grants.gov/web/grants/applicants/workspace-overview.html>.

- a. *Create a Workspace*: Creating a workspace allows you to complete it online and route it through your organization for review before submitting.
- b. *Complete a Workspace*: Add participants to the workspace to work on the application together, complete all the required forms online or by downloading PDF versions, and check for errors before submission. The Workspace progress bar will display the state of your application process as you apply. As you apply using Workspace, you may click the blue question mark icon near the upper-right corner of each page to access context-sensitive help.
- c. *Adobe Reader*: If you decide not to apply by filling out webforms you can download individual PDF forms in Workspace. The individual PDF forms can be downloaded and saved to your local device storage, network drive(s), or external drives, then accessed through Adobe Reader.

NOTE: Visit the Adobe Software Compatibility page on Grants.gov to download the appropriate version of the software at: <https://www.grants.gov/web/grants/applicants/adobe-software-compatibility.html>.

- d. *Mandatory Fields in Forms*: In the forms, you will note fields marked with an asterisk and a different background color. These fields are mandatory fields that must be completed to successfully submit your application.
- e. *Complete SF-424 Fields First*: The forms are designed to fill in common required fields across other forms, such as the applicant's name, address, and UEI number. To trigger this feature, an applicant must complete the SF-424 information first. Once it is completed, the information will transfer to the other forms.
- f. *Submit a Workspace*: An application may be submitted through workspace by clicking the Sign and Submit button on the Manage Workspace page, under the Forms tab. Grants.gov recommends submitting your application package at least 24-48 hours prior to the close date to provide you with time to correct any potential technical issues that may disrupt the application submission.
- g. *Track a Workspace Submission*: After successfully submitting a workspace application, a Grants.gov Tracking Number (GRANTXXXXXXXX) is automatically assigned to the application. The number will be listed on the Confirmation page that is generated after submission. Using the tracking number, access the Track My Application page under the Applicants tab or the Details tab in the submitted workspace.

For additional training resources, including video tutorials, refer to:

<https://www.grants.gov/web/grants/applicants/applicant-training.html>.

Applicant Support: Grants.gov provides applicants 24/7 support via the toll-free number 1-800-518-4726 and email at support@grants.gov. For questions related to the specific grant opportunity, contact the number listed in the application package of the grant to which you are applying.

If you are experiencing difficulties with your submission, it is best to call the Grants.gov Support Center and get a ticket number. The Support Center ticket number will assist DHS with tracking your issue and understanding background information on the issue.

9. Timely Receipt Requirements and Proof of Timely Submission

Online Submission. All applications must be received by 11:59 PM Eastern time on the due date established for each program. Proof of timely submission is automatically recorded by Grants.gov. An electronic date/time stamp is generated within the system when the application is successfully received by Grants.gov. The applicant with the AOR role who submitted the application will receive an acknowledgement of receipt and a tracking number (GRANTXXXXXXXXX) from Grants.gov with the successful transmission of their application. This applicant with the AOR role will also receive the official date/time stamp and Grants.gov Tracking number in an email serving as proof of their timely submission.

When DHS successfully retrieves the application from Grants.gov, and acknowledges the download of submissions, Grants.gov will provide an electronic acknowledgment of receipt of the application to the email address of the applicant with the AOR role who submitted the application. Again, proof of timely submission shall be the official date and time that Grants.gov receives your application. Applications received by Grants.gov after the established due date for the program will be considered late and will not be considered for funding by DHS.

Applicants using slow internet, such as dial-up connections, should be aware that transmission can take some time before Grants.gov receives your application. Again, Grants.gov will provide either an error or a successfully received transmission in the form of an email sent to the applicant with the AOR role attempting to submit the application. The Grants.gov Support Center reports that some applicants end the transmission because they think that nothing is occurring during the transmission process. Please be patient and give the system time to process the application.

10. Content and Form of Application Submission

See Appendices A and B for a list of required documents for this application, forms, and formats. No pre-applications or letters of intent are required to apply.

As discussed in the eligibility section of this NOFO, current awardees and sub-awardees under the FY 2022 Citizenship and Integration Grant Program (funding opportunities DHS-22-CIS-010-002 and DHS-22-CIS-010-003) are not eligible to receive funding under this funding opportunity. Additionally, proposed subrecipients to DHS-23-CIS-010-01 (Regional Hub Grants) are not eligible to receive funding under this funding opportunity.

11. Other Submission Requirements

DHS is participating in the Grants.gov initiative to provide the grant community with a single site to find and apply for grant funding opportunities. DHS requires applicants to submit their applications online through Grants.gov. Applications that are not submitted through Grants.gov by the deadline will not be considered.

12. Funding Restrictions

Grant funds may **not** be used for the following purposes:

- a. Cost-sharing or matching funds for other federal grants, lobbying, or intervention in federal regulatory or adjudicatory proceedings. In addition, federal funds may **not** be used to sue the federal government or any other government entity.
- b. USCIS application fees.
- c. Costs of organized fundraising, including financial campaigns, endowment drives, solicitation of gifts and bequests, and similar expenses incurred solely to raise capital or obtain contributions.
- d. Profit/Fee is not allowable except when subcontracting for routine goods and services with commercial organizations.
- e. Foreign travel.
- f. Construction costs and purchase of real property under this funding opportunity.
- g. Pre-award costs.
- h. Funding for direct reimbursement of proposal development.
- i. Costs for food or refreshments.
- j. Incentive items or gift cards.
- k. General volunteer stipends.
- l. Living allowances for any national volunteer service program participants.
- m. Fees for conferences that are not considered training events.

13. Allowable Costs

- a. DHS grant funds may only be used for the purposes set forth in the agreement and must be consistent with the statutory authority for the award. Grant funds may be used for the following purposes:
 - 1.) Providing services to qualified LPRs only, regardless of race, color, religion, sex, or national origin.
 - 2.) Resources to support citizenship instruction, including staff salaries, textbooks/materials, nationally normed standardized assessment tests, software, etc.
 - 3.) Professional development and training for staff and/or volunteers related to the provision of citizenship instruction and/or naturalization application services.
 - 4.) Facility rental costs **not** to exceed more than 20% of the total approved budget.
 - 5.) Resources to support naturalization application services including staff salaries, case management systems, costs associated with DOJ recognition of organizations and accreditation (or renewal) of staff. This includes training costs related to DOJ recognition and accreditation.
 - 6.) Transportation costs for students attending grant-funded classes.

- a. Transportation funds provided to students must match the student's individual transportation costs.
 - b. Applicants must have a system to track how transportation funds are used.
- 7.) Reimbursement of transportation costs for volunteers participating in grant-funded activities. Volunteers may **not** receive a general transportation stipend.
 - a. Transportation funds provided to volunteers must match the volunteers' individual transportation costs.
 - b. Applicants must have a system to track how transportation funds are used.
- 8.) Childcare costs to assist eligible participants to attend grant-funded classes.
- 9.) Travel costs for two staff members to attend a mandatory two-day grant recipient training in the Washington, D.C. area during the first year of the grant, and costs for one teacher or coordinator to attend a USCIS teacher training (or another professional development training with approval from USCIS) during the second year of the grant.
- 10.) Equipment purchases directly related to the provision of services.
- 11.) Costs associated with the use of computers for citizenship instruction (e.g., computer equipment, internet access, electronic tablets, etc.).

b. Management and Administration (M&A) Costs

Management and Administration Costs are allowable for the grantee and any proposed sub-awardee (if applicable). For more information on allowable costs, please see Funding Restrictions (above).

c. Indirect Facilities and Administrative (F&A) Costs

Indirect Costs (IDC) are allowable by the recipient and subrecipients as described in 2 C.F.R. Part 200, including 2 C.F.R. § 200.414. Applicants with a current negotiated IDC rate agreement who desire to charge indirect costs to an award must provide a copy of their IDC rate agreement at the time of application. Not all applicants are required to have a current negotiated IDC rate agreement. Applicants that are not required to have a negotiated IDC rate agreement but are required to develop an indirect cost rate proposal must provide a copy of their proposal at the time of application. Applicants who do not have a current negotiated IDC rate agreement (including a provisional rate) and wish to charge the de minimis rate must reach out to the Program Office and the Grants Office for further instructions.

E. Application Review Information

1. Application Evaluation Criteria

a. Programmatic Criteria

DHS will use the following criteria to evaluate applications deemed eligible and responsive. Applicants can receive up to 100 points.

1) Capacity and Need to Provide Comprehensive Citizenship Instruction (15 Points)

The extent to which the applicant demonstrates:

- Experience providing citizenship instruction (a minimum of 1 year of experience within the past 3 years is required) (5 points);
- Experience providing ESL instruction (for a minimum of 1 year experience within the past 3 years is required) (5 points); and
- The need for citizenship instruction within the immigrant community that the applicant serves (5 points).

2) Quality of the Proposed Citizenship Instruction Program (30 points)

The extent to which the applicant proposes a high-quality citizenship instruction program to meet the citizenship education needs of the community, including:

- Attainable citizenship instruction program goals (2 points);
- Detailed outreach, orientation, intake, and student retention plans (4 points);
- Plans to use a nationally normed standardized ESL assessment test for pre and post testing of citizenship students (4 points);
- Well-developed and appropriate curriculum and class structure, including the use of managed enrollment, integration activities, and textbooks for all students (10 points); and
- Qualified and experienced instructors (as described in the project narrative requirements) (10 points)⁶.

3) Capacity and Need to Provide Comprehensive Naturalization Application Services (15 points)

The extent to which the applicant demonstrates:

- Recent experience preparing and filing Forms N-400 and G-28 for qualified LPRs within the authorized practice of immigration law⁷ (10 points); and
- The need for naturalization application services within the immigrant community that the applicant serves (5 points).

4) Quality of the Proposed Naturalization Application Services Program (30 points)

The extent to which the applicant proposes a high-quality naturalization application services program, including:

- Attainable naturalization application services program goals (4 points);
- Detailed outreach and intake plans (4 points);

⁶ Please see USCIS' Professional Development Guide for Adult Citizenship Educators for competencies USCIS would expect qualified and experienced personnel to demonstrate in the citizenship instruction classroom. Programs whose instructors 1) hold a degree in TESOL; and/or 2) hold TESOL certifications from a state licensing agency; and/or 3) have a minimum of two years of experience in TESOL instruction in a classroom setting for a program that utilizes a textbook and a structured curriculum are more likely to receive funding.

⁷ DHS requires that all applicants demonstrate experience providing naturalization application services within the authorized practice of immigration law. Applications that fail to demonstrate this experience will not be scored on criteria 3 and 4 and, as a result, will be deemed ineligible.

- High-quality service delivery and case management (10 points); and
- Qualified and experienced legal service provider(s) (as described in the project narrative requirements) (12 points).

5) Integration of Services (4 points)

The extent to which the applicant:

- Demonstrates a plan to provide integrated citizenship preparation services. A well-defined cross-referral plan is required, that ensures priority access for enrolled students seeking legal services, and for legal applicants interested in citizenship instruction (2 points); and
- Includes all required information and supporting documentation (2 points).

6) Cost and Program Effectiveness and Balance (6 points)

The extent to which the applicant's:

- Proposed budget is tied to the delivery of programmatic services and demonstrates a balance between funding dedicated to citizenship instruction and naturalization application services (2 points);
- Proposed budget demonstrates an effort to satisfy the 10% cost share requirement (2 points); and
- Proposed budget includes funding for student textbooks, pre-and post-tests, site visits to subrecipients (if applicable), travel to USCIS interviews, and all other items required to effectively offer a high-quality citizenship preparation program (2 points).

b. Financial Integrity Criteria

Prior to making a federal award, the DHS GFAD is required by 31 U.S.C. §3321 note, 41 U.S.C. §2313, and 2 C.F.R. §200.205 to review information available through any OMB-designated repositories of government wide eligibility qualification or financial integrity information. Therefore, application evaluation criteria may include the following risk-based considerations of the applicant:

- 1.) Financial stability.
- 2.) Quality of management systems and ability to meet management standards.
- 3.) History of performance in managing federal award.
- 4.) Reports and findings from audits.
- 5.) Ability to effectively implement statutory, regulatory, or other requirements.

c. Supplemental Financial Integrity Criteria and Review

Prior to making a federal award where the anticipated total federal share will be greater than the simplified acquisition threshold, currently \$250,000 (see Section 805 of the National Defense Authorization Act for Fiscal Year 2018, Pub. L. No. 115-91, OMB Memorandum M-18-18 at <https://www.whitehouse.gov/wp-content/uploads/2018/06/M-18-18.pdf>):

- 1) DHS GFAD is required to review and consider any information about the applicant that is in the designated integrity and performance system accessible through

SAM, which is currently the Federal Awardee Performance and Integrity Information System (FAPIIS) and is accessible through the sam.gov website.

- 2) An applicant, at its option, may review information in FAPIIS and comment on any information about itself that a federal awarding agency previously entered.
- 3) DHS GFAD will consider any comments by the applicant, in addition to the other information in FAPIIS, in making a judgment about the applicant's integrity, business ethics, and record of performance under federal awards when completing the review of risk posed by applicants as described in 2 C.F.R. §200.206.

2. Review and Selection Process

DHS will conduct an initial review of applications to determine the responsiveness of the application. If an applicant is determined to be ineligible (see section C. Eligibility Information) or an application is determined to be non-responsive, DHS will notify the applicant. All responsive and eligible applications will be reviewed as described below:

- a. DHS will assemble reviewers which may include both federal and non-federal reviewers to review the eligible applications. Reviews of submitted applications will be conducted by remote review.
- b. Teams of technical reviewers will review each eligible application against the evaluation criteria. The reviewers will assign a score and provide summary comments based on the evaluation criteria identified above.
- c. An application may be selected for post-review quality control and possible rescoring if it received significantly diverging scores and comments from reviewers.
- d. An internal review panel consisting of DHS staff will review the highest ranked applications and make final funding recommendations. The internal review panel may take applications out of rank order in consideration of strategic program priorities, which are identified below.
- e. DHS may perform an additional review of the applicant organization and any sub-awardees and/or its key personnel. This may include reviewing audit reports, publicly available materials, and/or government data which may have a bearing on award outcome. DHS may request additional materials from the applicant as part of this review, including:
 - 1.) The summary letter from the applicant's most recent audit report;
 - 2.) Documentation of previous grant award completion that includes the name of the grantor, amount awarded, and whether the grant recipient sufficiently completed the requirements of the grant award (e.g., a final close-out report, certification of grant award completion, etc.);
 - 3.) A pre-award site visit or investigation to determine and validate current services and proposed activities; and
 - 4.) A site visit conducted in the case of a contingent award to evaluate the organization's ability to satisfy the programmatic and administrative requirements of the grant. DHS

reserves the right to not pursue the completion of the award process if preliminary investigations and/or site visits do not provide sufficient evidence of organizational capacity to successfully administer the proposed grant.

- f. After the technical review and before making final funding decisions, DHS may contact the highest-ranking applicants to seek clarification and to negotiate technical and programmatic aspects of the application. This may include negotiations on the curriculum content, staffing, budget, and activities. If an application includes a proposed subrecipient that will provide additional or complementary direct grant-funded services in partnership with the main applicant, DHS may request to speak with all parties included in the application to ensure sufficient planning and coordination has taken place prior to making an award.
- g. Confidentiality and Conflict of Interest. Technical and cost proposals submitted under this NOFO will be protected from unauthorized disclosure in accordance with applicable laws and regulations. DHS may use one or more support contractors in the logistical processing of proposals; however, funding recommendations and final award decisions are solely the responsibility of DHS personnel.

DHS screens all technical reviewers for potential conflicts of interest. To determine possible conflicts of interest, DHS requires potential reviewers to complete and sign conflict of interest and nondisclosure forms. DHS will keep the names of submitting institutions and individuals as well as the substance of the applications confidential except to reviewers and DHS staff involved in the award process. DHS will destroy any unsuccessful applications after three years following the funding decision.

- h. DHS strongly discourages, and will not consider, any supplementary materials submitted by or on behalf of the applicant (e.g., letters of support) other than those materials specifically requested in this NOFO.
- i. DHS will notify all applicants electronically of funding decisions. Unfunded applicants may send a written request to citizenshipgrantprogram@uscis.dhs.gov to receive a written summary of comments related to the evaluation criteria, along with the points awarded to the application for each of the evaluation criteria. DHS will send the written summary to the applicant within 120 days of receipt of the request. Additional information beyond that described here will not be provided.
- j. **Strategic Program Priorities:** Based on the recommendations of the internal review panel, DHS may consider the following factors when making an award:
 - 1.) **Program Balance Factors**, including (in descending order of importance):
 - a.) Whether an application shows prioritization for marginalized, vulnerable, or underserved populations (e.g., populations that have historically not received USCIS funding);

- b.) Whether an application, when balanced with other potential awards and with existing Citizenship and Integration Grant Program recipients, represents a diverse geographic area;
- c.) Whether an application, when balanced with other potential awards and existing Citizenship and Integration Grant Program recipients, represents a diverse population; and
- d.) Whether an application, when balanced against other potential awards with similar scores, incorporates use of technology in the citizenship instruction program that would help immigrant students to gain sufficient digital literacy skills to navigate USCIS' educational resources and online application system.

2.) Past performance of a previous Citizenship and Integration Grant Program recipient (if applicable), including:

- a.) Whether a previous grant recipient achieved their core program goals;
- b.) Whether a previous grant recipient had major findings during a monitoring visit and failed to resolve them in the prescribed time period;
- c.) Whether a previous grant recipient was placed on restricted drawdown status for cause, and if so, whether they were able to meet the conditions to have this restriction removed; and
- d.) Whether a previous grant recipient demonstrated an ability to file accurate and timely quarterly performance reports.

F. Federal Award Administration Information

1. Notice of Award

Notice of award will be sent by DHS to the awardee's Authorized Organization Representative (AOR). Before accepting the award, the AOR and recipient should carefully read the award package. The award package includes instructions on administering the grant award and the terms and conditions associated with responsibilities under federal awards. By submitting an application, applicants agree to comply with the requirements of this NOFO and the terms and conditions of the award, should they receive an award.

A grant award will be executed by a DHS Grants Officer authorized to obligate DHS funding. Organizations that are being funded for the first time under this grant program will be placed on restricted drawdown until quarterly performance goals are met. Unsuccessful applicants will be contacted as well and will be encouraged to apply for future grant award programs. Announcements for future grant opportunities will be listed on [Grants.gov](https://www.dhs.gov/grants).

2. Administrative and National Policy Requirements

All successful applicants for DHS grant and cooperative agreements are required to comply with DHS Standard Terms and Conditions, which are available online at: [DHS Standard Terms and Conditions](#). In addition, awardees are required to comply with the prohibitions on certain telecommunications equipment and services under Section 889 of the [John. S. McCain National Defense Authorization Act](#) (NDAA) for Fiscal Year (FY) 2019.

Post-award program income: In the event program income becomes available to the recipient post-award, it is the recipient's responsibility to notify the DHS Grants Officer to explain how that development occurred, as part of their request for guidance and/or approval. The Grants Officer will review approval requests for program income on a case-by-case basis; approval is not automatic. Consistent with the policy and processes outlined in 2 C.F.R. Part 200, pertinent guidance and options, as determined by the type of recipient and circumstances involved, may be approved by the Grants Officer. If approval is granted, an award modification will be issued with an explanatory note in the remarks section of the face page concerning guidance and/or options pertaining to the recipient's approved request. All instances of program income must be listed in the progress and financial reports.

The applicable DHS Standard Terms and Conditions will be those in effect at the time the award was made unless the application is for a continuation award. In that event, the terms and conditions in effect at the time the original award was made will generally apply. What terms and conditions will apply for the award will be clearly stated in the award package at the time of award.

3. Reporting

a. Federal Financial Reporting Requirements

The recipient must submit a Form SF-425, Federal Financial Report (FFR), to the DHS Grants Officer no later than 30 days after the end of the reporting period end date. The FFR is available online at <https://www.grants.gov/web/grants/forms/post-award-reporting-forms.html>. The FFR shall be submitted via GrantSolutions using the guidance found here: www.grantsolutions.gov/support/public/pdf/FederalFinancialReport-RecipientsFinalv2.pdf.

The Federal Financial Report (FFR) form is available online at: [SF-425 OMB #4040-0014](https://www.grantsolutions.gov/support/public/pdf/SF-425%20OMB%20#4040-0014)

b. Programmatic Performance Reporting Requirements

The recipient is required to submit quarterly performance reports to the USCIS Program Office and the DHS Grants Officer within 30 days after the end of each quarter. Reports are due January 30, April 30, July 30, and October 30. Reports must be submitted via the USCIS Grantbook platform and GrantSolutions.gov using the guidance found here: <https://www.grantsolutions.gov/support/pdf/GrantRecipientProcessPerformanceProgressReport.pdf>

Grant recipients must collect and report data on each program participant served with grant funding, which may include:

- 1) Alien registration numbers. USCIS may use these numbers to track naturalization outcomes during and after the period of performance;
- 2) Class of admission for program participants;
- 3) Countries of birth;

- 4) When specific services were provided, including:
 - Dates participants were enrolled in citizenship courses;
 - Dates classes are held;
 - Dates pre- and post- tests were conducted, and scores achieved;
 - Classes attended, including the number of hours in class;
 - Dates naturalization eligibility screenings were conducted; and
 - Dates Forms N-400 and G-28 were filed.
- 5) Assessment data, including pre- and post-test scores;
- 6) Class proficiency levels;
- 7) Names of instructors(s) teaching each class;
- 8) Changes to key grant-funded personnel (this must be pre-approved by the program officer)
- 9) Number of instructional hours provided per class;
- 10) Number of students enrolled per class; and
- 11) Number of N-400s filed by the grant organization to USCIS.

In addition to collecting these data, grant recipients must also provide quarterly narrative reports. The narrative report may include questions on the following topics: program accomplishments, progress meeting goals, progress of the subrecipient organization (if applicable), challenges in meeting goals, staff and/or organizational development activities, student assessment and progress, outreach activities, volunteer recruitment and training, staff changes, progress made toward DOJ accreditation, and promising practices.

These data are used to measure and track grantee performance and assess the success of individual programs as well as the collective performance of all grantees. All grantee performance data can be used to determine continued and future USCIS grant funding.

c. Closeout Reporting Requirements

Within 120 days after the end of the period of performance, or after an amendment has been issued to close out a grant, recipients must submit the following:

- 1) The final request for payment, if applicable;
- 2) The final FFR (SF-425);
- 3) The final progress report detailing all accomplishments;
- 4) A qualitative narrative summary of the impact of those accomplishments throughout the period of performance; and
- 5) Other documents required by this NOFO, terms and conditions of the award, or other DHS FAO guidance.

After these reports have been reviewed and approved by the DHS Financial Assistance Office, a closeout notice will be completed to close out the grant. The notice will indicate the period of performance as closed, list any remaining funds that will be de-obligated, and address the requirement of maintaining the grant records for three years from the date of the final FFR, unless a longer period applies, such as due to an audit or litigation, for

equipment or real property used beyond the period of performance, or due to other circumstances outlined in 2 C.F.R. §200.334, Retention Requirements for Records.

In addition, any recipient that issues subawards to any subrecipient is responsible for closing out those subawards as described in 2 C.F.R. §200.344, Closeout. Recipients acting as pass-through entities must ensure that they complete the closeout of their subawards in time to submit all necessary documentation and information to DHS FAO during the closeout of their prime grant award.

The recipient is responsible for returning any funds that have been drawn down but remain as unliquidated on recipient financial records.

d. Disclosing Information per 2 C.F.R. §180.335

This reporting requirement pertains to disclosing information related to government-wide suspension and debarment requirements. Before a recipient enters into a grant award with DHS GFAD, the recipient must notify DHS GFAD if it knows if it or any of the recipient's principals under the award fall under one or more of the four criteria listed at 2 C.F.R. § 180.335:

- 1) Are presently excluded or disqualified;
- 2) Have been convicted within the preceding three years of any of the offenses listed in 2 C.F.R. § 180.800(a) or had a civil judgment rendered against it or any of the recipient's principals for one of those offenses within that time period;
- 3) Are presently indicted for or otherwise criminally or civilly charged by a governmental entity (federal, state, or local) with commission of any of the offenses listed in 2 C.F.R. § 180.800(a); or
- 4) Have had one or more public transactions (federal, state, or local) terminated within the preceding three years for cause or default.

At any time after accepting the award, if the recipient learns that it or any of its principals falls under one or more of the criteria listed at 2 C.F.R. § 180.335, the recipient must provide immediate written notice to DHS GFAD in accordance with 2 C.F.R. § 180.350.

e. Reporting of Matters Related to Recipient Integrity and Performance

Per 2 C.F.R. Part 200, Appendix I § F.3, the additional post-award reporting requirements in 2 C.F.R. Part 200, Appendix XII may apply to applicants who, if upon becoming recipients, have a total value of currently active grants, cooperative agreements, and procurement contracts from all federal awarding agencies that exceeds \$10,000,000 for any period of time during the period of performance of an award under this funding opportunity. Recipients that meet these criteria must maintain current information reported in FAPIIS about civil, criminal, or administrative proceedings described in paragraph 2 of Appendix XII at the reporting frequency described in paragraph 4 of Appendix XII.

f. Monitoring and Oversight

Per 2 C.F.R. §200.329, DHS GFAD, through its authorized representatives, has the right, at all reasonable times, to conduct desk reviews, make site visits to review project accomplishments and management control systems to review project accomplishments and to provide any required technical assistance. During site visits or desk reviews, DHS GFAD will review grant recipients' files related to the grant award. As part of any monitoring and program evaluation activities, grant recipients must permit DHS GFAD, upon reasonable notice, to review grant-related records and to interview the organization's staff and contractors regarding the program. Recipients must respond in a timely and accurate manner to DHS GFAD requests for information relating to the grant program.

If the monitoring visit results in a determination that basic, minimum requirements as outlined in the Notice of Funding Opportunity are not being met, DHS may require corrective actions and/or initiate termination of the award.

g. Program Evaluation

Recipients and subrecipients are encouraged to incorporate program evaluation activities from the outset of their program design and implementation to meaningfully document and measure their progress towards the outcomes proposed. Title I of the Foundations for Evidence-Based Policymaking Act of 2018 ([Evidence Act](#)), Pub. L. No. 115-435 (2019) defines evaluation as "an assessment using systematic data collection and analysis of one or more programs, policies, and organizations intended to assess their effectiveness and efficiency." Evidence Act § 101 (codified at 5 U.S.C. § 311). Credible program evaluation activities are implemented with relevance and utility, rigor, independence and objectivity, transparency, and ethics (OMB Circular A-11, Part 6 Section 290).

Evaluation costs are allowable costs (either as direct or indirect), unless prohibited by statute or regulation, and such costs may include the personnel and equipment needed for data infrastructure and expertise in data analysis, performance, and evaluation. (2 C.F.R. §200).

In addition, recipients are required to participate in a DHS-led evaluation if selected, which may be carried out by a third-party on behalf of the Program Office or DHS. By accepting grant funds, recipients agree to participate in the evaluation, which may include analysis of individuals who benefit from the grant, and provide access to program operating personnel and participants, as specified by the evaluator(s) for six months after the period of performance.

G. DHS Awarding Agency Contact Information

1. Contact and Resource Information

USCIS Program Office (Office of Citizenship):

- Send all questions to citizenshipgrantprogram@uscis.dhs.gov.
- USCIS Office of Citizenship staff will respond within five business days.

DHS Grants Office: Send all questions to the Grants Officer at CISMailbox@hq.dhs.gov

H. Other Information

Applicants can obtain NOFO overviews and announcement information from Grants.gov where the full NOFO is posted. Applications will be processed through the Grants.gov portal.

1. Period of Performance Extensions

Grantees may request a no-cost extension in order to complete all project activities. The request must be submitted 45 days prior to the expiration of the performance period. Grantee requests for extension will be evaluated based on performance to date and potential for meeting programmatic requirements within the proposed extension period. Requests for extensions are subject to approval by the DHS Grants and Financial Assistance Grants Officer.

2. Appendices

For information on additional required documents, and the format of the narrative application please see Appendix A. Appendix B provides a checklist of documents to submit with each application. Appendix C contains list of USCIS citizenship education resources. For definitions of frequently used terms in this NOFO, see the FY 2023 Glossary in Appendix D.

APPENDIX A: ADDITIONAL REQUIRED FORMS

Complete the required forms in accordance with the application instructions on Grants.gov. If submitting any information that is deemed proprietary, privileged or confidential, commercial or financial, please denote the beginning and ending of such information with asterisks (***)

1. Form SF-424 – Application for Federal Assistance

This form must be completed within the application package on Grants.gov. You must download and install Adobe Reader to view this form. Applicants are only required to complete fields which are highlighted.

2. Form SF-424A – Budget

This form must be completed within the application package on Grants.gov. You must download and install Adobe Reader to view this form. Applicants are only required to complete fields which are highlighted. Provide budget amounts by object class (personnel, fringe benefits, travel, etc.). Include second year budget amounts in Section E. Funds may be requested if the item and amount are necessary to perform the proposed work and are not precluded by the cost principles or program funding restrictions.

3. Certifications/Assurances

These forms must be completed within the application package on Grants.gov. You must download and install Adobe Reader to view these forms. Applicants must submit:

- a. Form SF-424B – Assurances – Non-Construction Programs; and**
- b. Certification Regarding Lobbying.** If paragraph two of the certification applies, then complete and submit SF-LLL Disclosure of Lobbying which is provided as an optional form in the application package.

By signing and submitting an application under this announcement, the applicant is providing: Certification Regarding Drug-Free Workplace Requirements; Certification Regarding Debarment, Suspension, and Other Responsibility Matters – Primary Covered Transactions; and Certification that the applicant is not delinquent on any federal debt.

4. Project Abstract (5 pages maximum)

Provide the information requested below. Please address each question in the order outlined in the table below. The project abstract must not include any proprietary or confidential information. Attach the Project Abstract to the application package.⁸

⁸ See the Grants.gov [Applicant User Guide](#) for instructions on how to attach forms and documents.

General Information		
Complete the following table.		
1.	Organization legal name	
2.	Organization legal address (Number and street, city, state, zip code)	
3.	Head of the organization (Name, title, address, phone number, email address)	
4.	Authorized Organization Representative (AOR), the person at the organization authorized to sign and receive award (Name, title, address, phone number, email address and website)	
5.	Grant Project Manager, the person who will manage operations of the grant project and will serve as USCIS' primary point of contact (Name, title, address, phone number, email address)	
6.	Type of organization (e.g., community/faith-based organization, public school, adult education program, public library)	
7.	Total numbers organization is proposing to serve with this grant: <ul style="list-style-type: none"> • Students enrolled; • Form N-400 screenings; • Form N-400's filed 	
8.	Annual Organizational Budget	
9.	Total federal funding requested (up to \$300,000)	
10.	Total federal funding allocated for citizenship instructor salaries	
11.	Total federal funding allocated for administrative costs	
12.	Total cost share (percentage of total award amount requested; minimum of 10% required)	
13.	Geographic area/community where services will be provided	
14.	Congressional district (based on the legal address of the applicant organization)	
15.	Number of full-time equivalents (FTEs). Indicate the number of intended grant-funded FTEs.	

16.	Fees charged for citizenship instruction (if applicable)	
17.	Fees charged for naturalization application services (if applicable)	
18.	Is your organization or proposed subrecipient DOJ recognized? (yes/no)	
19.	List all employees who are DOJ Accredited or attorneys who will work on this grant	
21.	List any grants received by the applicant in the past three years focused on adult education or services to immigrants. Include: <ul style="list-style-type: none"> • Awarding agency • Date received • Dollar amount 	
Proposed Subrecipient Organization(s) (if applicable) <i>If there are multiple subrecipients, provide the below information for each.</i>		
22.	Subrecipient organization legal name	
23.	Subrecipient organization point of contact (Name, title, address, phone number and email address)	
24.	Is the subrecipient a non-profit or public organization? If not, the subrecipient is not eligible to receive funding	
25.	Subrecipient type of organization (e.g., community/faith-based organization, public school, adult education program, public library, etc.)	
26.	Services proposed by subrecipient organization (legal services, education services, or both)	
27.	Total federal funds allocated for the subrecipient	

5. Project Narrative (16 double-spaced page maximum)

In a separate document, provide a response for each item in the chart below following the order listed. **The items and attachments listed in each section below are required.** Any item or attachment that is omitted will result in a points deduction.

Format Requirements

- Include the title “Project Narrative” at the top of the first page.

- Ensure that the application can be printed on 8 ½” x 11” single-sided paper.
- Use double line spacing.
- Font size must be at least 12 point, preferably Times New Roman font.
- Margins must be at least one (1) inch at the top, bottom, left and right of the paper.
- Project narrative pages must be numbered “1” of “XX.”
- Pages should be numbered consecutively and are limited to a total of **16 pages**.
- Do not include any marks from the “Track Changes” tool in your word processing program.
- Attach the completed Project Narrative to the application package.

Project Narrative Items
A. Citizenship Instruction Program
1. Capacity to Provide Citizenship Instruction
<ul style="list-style-type: none"> • The applicants recent experience providing ESL instruction (the description must distinguish if it is the applicant or proposed subrecipient’s experience). Include: <ul style="list-style-type: none"> ○ Dates and total years of experience providing ESL instruction; ○ The number of students enrolled in ESL classes in the past year and any previous years; ○ Name of the standardized test of English language proficiency used (such as CASAS, BEST Plus 2.0, TABE CLAS-E, etc.); ○ Experience administering the standardized test(s); ○ The program’s pre- and post-test rates for the last program cycle, if applicable, as well as the percentage of ESL students that demonstrated educational gains in that same program cycle. • The applicant’s (or proposed subrecipient’s) recent experience providing citizenship instruction. Include the following: <ul style="list-style-type: none"> ○ Dates and total years of experience providing citizenship instruction; ○ The number of students enrolled in citizenship instruction in the past year and any previous years; ○ If available, the naturalization test pass rate for program participants; and ○ The textbook and other resources used. • The particular LPR population(s) that the applicant currently serves with citizenship and ESL instruction. • The need for citizenship instruction among the LPR population, including whether there are wait lists for citizenship instruction and/or ESL instruction at the applicant’s organization. Indicate whether there are other citizenship and ESL instruction service providers in the area.

2. Proposed Goals for Enrollment, Testing, and Educational Gains

- Explain how the proposed number of students to be served under the grant-funded program is attainable based on your organization's experience, past performance, and the proposed budget.
- Explain how the proposed goals for 1.) the percentage of students to be pre- and post-tested and 2.) the percentage of students demonstrating educational gains are feasible based on your organization's experience, past performance, and proposed budget.
- Describe the retention strategies employed or that will be employed to maintain a satisfactory post-test rate. Describe the strategies employed or that will be employed to assist students who are not making educational gains.
- Indicate how many additional students will be served under the grant-funded program that would otherwise not be served.

3. Program Administration

- The outreach plan to raise awareness of program services and recruit students.
- The intake procedures, including how the organization will verify and document that only LPRs will receive services funded through this funding opportunity.
- The orientation process for new students.
- The strategies you use to address barriers to student attendance (e.g., transportation, childcare, tuition and fees, etc.), and your organization's attendance policy.
- The proposed managed enrollment policy for the program, including whether students will be permitted to enroll in grant-funded classes after the start of a class cycle (and if so, the enrollment cut-off period). Include how the organization will accommodate students who desire to attend classes after the registration period has closed.
Note: Programs may not enroll students after the third class.
- The proposed plan for pivoting to virtual or hybrid services.
- Organizations may charge a nominal fee for enrollment or materials of \$50 or less. Organizations may use this fee as a deposit that may be refunded at the end of the course. Note that any fees collected and not returned to students are considered program income and would need to be re-invested into the program.

4. Class and Management Structure

- A description of the specific nationally normed standardized test or test(s) that will be used for the program to assess English language proficiency. ⁹ Please also describe when the tests will be administered, who will conduct the tests, and how they will be trained to administer the tests.
- Complete the table below with information from the classes you are proposing for this grant. We have provided sample information as a guide.

Name of Class	Location	Days, Times	Length/Total Instructional Hours	Textbook	Instructor's Name
High Beginning	Main campus Building A	Mondays and Wednesdays 6:00-8:00	10 weeks each quarter/40 hours	Citizenship Tomorrow-Acme Publishing 2019 27 th edition	Jill Brown

- Provide a separate document as an attachment to the proposal summarizing your proposed grant-funded citizenship program. ¹⁰ This document will not count towards your project narrative page limit and must include:
 - A course outline or syllabus. Do not attach copies of books or USCIS materials;
 - Course learning objectives (for each course); and
 - Textbook(s) and supplemental materials to be used.

⁹ The standardized tests that the Department of Education has determined to be suitable to assess English language proficiency as listed in [Federal Register Notice Tests Determined To Be Suitable for Use in the National Reporting System](#).

¹⁰ For guidance on developing a citizenship curriculum, please review the [USCIS Guide to Creating an Adult Citizenship Education Curriculum](#)

5. Personnel

- Using the below sample staff table as a template, please provide information on citizenship instruction program staff. Please also provide resumes for each staff member included in the chart.

Sample Staff Table				
Name	Title and Position Description	Paid or Volunteer	FTE Charged to Grant	Relevant experience, qualifications, and training
Jill Brown	Education Program Coordinator – manages adult education programs	Paid	0.5 FTE	TESOL degree, 5 years of experience as a program manager, 10 years of experience teaching ESL

- If applicable, explain how **volunteers** will be used for the citizenship instruction program. Describe their roles and responsibilities, the training they will receive, and the reporting structure. Volunteers must be managed by a paid lead instructor or a paid education program coordinator.
- If your organization only has one instructor on staff at the time of application, please describe your organization's **contingency plan** for the provision of citizenship instruction in the event of staff turnover.
- Any changes to key personnel must be pre-approved by the program officer.

B. Naturalization Application Services Program

1. Capacity to Provide Naturalization Application Services

- The naturalization application services provider's **recent experience providing naturalization application services within the authorized practice of immigration law**. Include:
 - Dates and total years of experience preparing and filing Forms N-400 and G-28;
 - Whether the services were provided by attorneys or by DOJ accredited representatives; and
 - The number of LPRs served in the past year and any previous years.
- Program achievements**, including the organization's record of filing successful naturalization applications.
- The **particular LPR population(s) that the applicant serves** with naturalization application services.
- The **need for naturalization application services** among the LPR population served, including whether there are wait lists for services. Indicate whether there are other naturalization application service providers in the area.

2. Attainable Naturalization Application Services Goals

- Explain how the proposed number of naturalization participants to be served under the grant-funded program is feasible based on your organization's experience, past performance, and the proposed budget.
- Indicate how many naturalization applications you intend to file in the next two years with this grant funding that otherwise would not have been filed. Please reference your program goals table attachment.

3. Program Administration

- The coordinated **outreach plan** to raise awareness of services and recruit participants.
- **The intake procedures**, including how the organization and subrecipients (if applicable) will verify and document that only LPRs will receive services funded through this funding opportunity, and who will conduct intake.
- The proposed plan for pivoting to virtual or hybrid services.
- A nominal fee of \$75 or less may be charged for legal services. Organizations may not charge different fees to LPRs based on case complexity.

4. Service Delivery and Case Management

- The naturalization application services provided, including the forms filed on behalf of clients.
- The naturalization eligibility screening process and who will determine clients' eligibility for naturalization.
- How your organization handles complex cases.
- The support provided to clients throughout the application process (e.g., from intake until the oath ceremony).
- How your organization prepares clients for the naturalization interview.
- How your organization keeps clients informed of their case status.
- Any plans to use grant funds to hold group application workshops, and if so, the process for following up with those clients about their cases.

5. Personnel

- The **staffing structure** for the proposed naturalization application services program.
 1. Provide a list of key personnel for the program. Key personnel include the project manager(s), the DOJ accredited representative(s) and/or attorney(s), and any additional case workers. Provide resumes for each listed staff member.
 2. For each person, provide the following information, preferably in a table format:
 - a. Name, or indicate if the position is vacant. If the position is vacant, provide a separate position description and target start date;

- b. Title and brief position description;
 - c. Whether the position is paid or volunteer;
 - d. FTE charged to the grant;
 - e. Relevant experience, qualifications, and training. For the DOJ accredited representative(s) and/or attorney(s), indicate the level of experience providing naturalization application services; and
 - f. Indicate who will sign Form N-400 as the preparer and who will sign the Form G-28 in connection with all naturalization applications filed under this grant.
- Changes to key personnel must be pre-approved by the USCIS Program Office.

See below for a sample staff table.

Sample Staff Table				
Name	Title and Position Description	Paid or Volunteer	FTE charged to grant	Relevant experience, qualifications, and training
Jim Smith	DOJ accredited representative – provides immigration legal services to clients	Paid	0.3 FTE	Accredited for 5 years, 3 years of experience with naturalization application services

- If your organization has only one staff member that is DOJ accredited or an attorney, please describe your organization’s **contingency plan** for the provision of naturalization application services in the event of staff turnover. You may use grant funds to cover costs associated with the DOJ accreditation of additional staff members.
- If applicable, explain **how volunteers will be used** for the naturalization application services program. Describe their qualifications, roles and responsibilities, the training they will receive, and the reporting structure.

C. Integration of Services

- The plan to provide **integrated citizenship preparation services** so that program participants are aware of the full range of grant-funded services and can easily access both types of services (citizenship instruction and naturalization application assistance). Indicate who will coordinate both components of the grant program and ensure that outreach, intake, and services are conducted in an integrated manner.
- The **communications plan** for maintaining regular contact between the service providers, including how often meetings will take place and in what manner (by phone or in-person).
- The **cross-referral process** between the citizenship instruction provider(s) and the naturalization application services provider(s).

- Plans for a **coordinated data collection system**, including how the organization and subrecipient (if applicable) will track and report on services provided and whether students and clients naturalize. Explain the system used for tracking data.
- If a **subrecipient** is proposed, describe the applicant's history working with the subrecipient organization. Describe the applicant's plan for managing the subrecipient's performance and maintaining frequent communication with the subrecipient.

6. Project Narrative Attachments

NOTE: The attachments will not count toward the page limit for the Project Narrative. These items should be attached to the application package.

- a. Attach **résumés** and/or **position descriptions** (if the position is vacant) for all key personnel, including program managers and coordinators, instructors (paid and volunteer), attorneys and/or DOJ accredited representatives, and other legal support staff. Résumés must include all relevant job experience, education, and licensure or accreditation with corresponding dates.
- b. **Organizational chart** for the applicant and any proposed subrecipient(s).
- c. If you propose a subrecipient, the applicant must include a signed **Memorandum of Understanding (MOU)** between the organizations as a required attachment to the grant application. The MOU should include the responsibilities expected of each party, performance expectations, plans for maintaining communication, and the payment and/or reimbursement process for the subrecipient(s). The MOU should be signed by both parties and dated.

7. Program Goals

Provide the following goals for grant-funded services in a table format. Include the total number over the 2-year period, as well as a breakdown by quarter. There are 8 quarters over the 2-year performance period and each quarter is 3 months long.

Goal	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Total
1. Number of newly enrolled (non-duplicated) LPRs to enroll in citizenship instruction classes									
2. Percentage of enrolled students who post-test (Minimum 80%)									
3. Percentage of post-tested students demonstrating measurable educational gains (Minimum 80%)									
4. Number of LPRs for whom your organization will provide naturalization eligibility screenings									
5. Number of LPRs for whom your organization will prepare and file Form N-400 and Form G-28									

8. Budget Table and Narrative

When proposing costs for this grant program, ensure that the budget shows a reasonable balance of costs between the citizenship instruction program and the naturalization application services program.

If a **subrecipient** is proposed, applicants must provide a separate subrecipient budget narrative and table following the same format and with the same level of detail as that of the applicant (that is, by Object Class Category/Cost Classification). Each subrecipient budget and supporting detail should be separate from the applicant's budget narrative.

If any fees are proposed that will result in program income, show in the budget how this income will be used to support the program.

Budget Table

Provide your budget request in a table format in addition to the budget narrative. Include all budget categories, as listed in the budget narrative section. Under each category list the line items requested. See sample table below. Note: This sample table shows the Personnel category only. Applicants must provide information on all budget categories.

	Year 1			Year 2			Total		
Category and Item	In-Kind	DHS	Total	In-kind	DHS	Total	In-kind	DHS	Total
1. Personnel									
J. Smith, Program Manager – 1 FTE	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X
B. Diaz, Instructor – 0.5 FTE	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X
L. Santiago, Attorney – 1 FTE	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X
K. Brown, Assistant – 0.25 FTE	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X
TOTAL Personnel	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X

The Budget Table may be provided either in the same document as the budget narrative or attached to the application package.

Budget Narrative (Five-page limit)

Attach your budget narrative (including separate budget narratives for each proposed subrecipient) to the application package. Please limit the information provided in this section to budget relevant information only.

Include costs for the first and second performance years. Separate the first performance year costs from the second performance year costs. Show a total of all requested federal grant funds. This total should match the total listed on the project abstract. Budget categories **b – h** below should add up to this total. This total should **not** include any in-kind costs. The in-kind contribution total should be listed separately.

Provide budget information in the order listed below. Budget detail is required for:

- a. **In-Kind Costs:** The dollar value of non-cash donations to the project. These donations may be in the form of space, supplies, salaries, etc. The costs should be calculated at the verifiable fair-market value.
- b. **Personnel:** Costs of employee salaries and wages. For each staff person, provide the name (if known), title, time commitment to the project as a percentage of a full-time

equivalent (FTE), annual salary, and grant-funded salary. Do not include the costs of consultants. Consultants are to be included under “Contractual.”

- c. **Fringe Benefits:** Costs of employee fringe benefits unless treated as part of an approved indirect cost rate. Provide the method used to calculate the proposed rate amount. If a fringe benefit has been negotiated with, or approved by, a cognizant federal agency, **attach a copy of the negotiated fringe benefit agreement**. If no rate agreement exists, provide a breakdown of the amounts and percentages that comprise fringe benefit costs such as health insurance, FICA, retirement insurance, taxes, etc. Identify the base for allocating these fringe benefit expenses. (Attach the agreement to the application package.)
- d. **Travel:** Costs of project-related travel by employees of the applicant organization and/or subrecipient (do not include costs of sub-contractor or consultant travel). For each proposed trip, provide the purpose, number of travelers, travel origin and destination, number of days, and a breakdown of costs for airfare, lodging, meals, car rental, and incidentals. The basis for the airfare, lodging, meals, car rental, and incidentals must be provided, such as past trips, current quotations, Federal Travel Regulations, etc. Foreign travel is not permitted. The applicant must include costs for two staff members to attend a **mandatory** two-day grant recipient orientation training in Washington, D.C. the first year of the grant, and costs for a teacher/coordinator to attend a USCIS teacher training on activities and methods that promote linguistic and civic assimilation during the second year of the grant.
- e. **Equipment:** Any article of nonexpendable, tangible personal property having a useful life of more than one year and an acquisition cost which equals or exceeds the lesser of (a) the capitalization level established by the organization for financial statement purposes, or (b) \$5,000. For each type of equipment requested, provide a description of the equipment, the cost per unit, the number of units, the total cost, and a plan for use on the project, as well as use or disposal of the equipment after the project ends. An applicant organization that uses its own definition for equipment should provide a copy of its policy or section of its policy which includes the equipment definition.

NOTE 1: Acquisition cost means the net invoice unit price of an item of equipment, including the cost of any modifications, attachments, accessories, calibration and maintenance services, or auxiliary apparatus necessary to make it usable for the purpose for which it is acquired. Ancillary charges, such as taxes, duty, protective in-transit insurance, freight, and installation must be included in or excluded from acquisition cost in accordance with the organization’s regular written accounting practices.

NOTE 2: Before purchasing equipment in the amount of \$5,000 or more per unit cost, the Recipient must obtain the written approval from DHS. For equipment purchased with grant funds (or received under a grant) and having a \$5,000 or more per unit cost, the Recipient must maintain an annual inventory, which will include a

brief description of the item, serial number, and amount of purchase. The inventory must also identify the sub-award under which the equipment was purchased. Maintenance and insurance will be the responsibility of the Recipient. Title of equipment will remain with the Recipient until closeout when disposition will be provided in writing by DHS within 120 days of submission of final reports.

- f. **Supplies:** Costs of all tangible personal property other than that included in the equipment category. Specify general categories of supplies and their costs. Show computations and provide other information which supports the amount requested. Grantees should calculate the cost of assessments as well as printing the USCIS required assessment.
- g. **Contractual:** Costs of all contracts for services and goods except for those that belong under other categories such as equipment, supplies, construction, etc. Include third party evaluation contracts (if applicable) and contracts with secondary recipient organizations.

Demonstrate that all procurement transactions will be conducted in a manner to provide, to the maximum extent practical, open and free competition. Identify proposed sub-contractor work and the cost of each sub-contractor. Provide a detailed budget for each sub-contractor that is expected to perform work estimated to be \$25,000 or more, or 50% of the total work effort, whichever is less.

- Identify each planned subcontractor and its total proposed budget. Each subcontractor's budget and supporting detail should be included as part of the applicant's budget narrative.
- Provide the following information for each planned subcontract: a brief description of the work to be subcontracted; the number of quotes solicited and received, if applicable; the cost or price analysis performed by the applicant; names and addresses of the subcontractors tentatively selected and the basis for their selection; e.g., unique capabilities (for sole source subcontracts), low bidder, delivery schedule, technical competence; type of contract and estimated cost and fee or profit; and, affiliation with the applicant, if any.
- Recipient may be required to make pre-award review and procurement documents available to DHS, including request for proposals or invitations for bids, independent cost estimates, etc. This may include procurements expected to exceed the simplified acquisition threshold fixed at 41 U.S.C. § 403(11) (currently set at \$100,000) and expected to be awarded without competition or only one bid or offer is received in response to a solicitation.
- All required flow down provisions in the award must be included in any subcontract.

NOTE: Applicants may propose a sub-contract for specific tasks, such as hiring additional citizenship instructors on a contractual basis.

However, the applicant must demonstrate its ability to successfully manage all aspects of the grant-funded project, including financial management. **Private law firms and attorneys in private practice are not eligible to receive funding under this funding opportunity.**

- h. **Other Direct Costs**: Any other items proposed as direct costs. Provide an itemized list with costs and state the basis for each proposed item.

Attach a copy of the latest indirect cost rate agreement negotiated with a cognizant federal agency. If the applicant is in the process of initially developing or renegotiating a rate, upon notification that an award will be made, it should immediately develop a tentative indirect cost rate proposal based on its most recently completed fiscal year, in accordance with the cognizant agency's guidelines for establishing indirect cost rates and submit it to the cognizant agency. Applicants awaiting approval of their indirect cost proposals may also request indirect costs. When an indirect cost rate is requested, those costs included in the indirect cost pool should not also be charged as direct costs to the award. If the applicant is requesting a rate which is less than what is allowed under the program, the authorized representative of the applicant organization must submit a signed acknowledgement that the applicant is accepting a lower rate than allowed.

Any non-federal entity that has never received a negotiated indirect cost rate (except for those non-federal entities described in Appendix VII to Part 200 States and Local Government and Indian Tribe Indirect Cost Proposals, paragraph D.1.b) may elect to charge a de minimis rate of 10% of modified total direct costs (MTDC) which may be used indefinitely. As described in §200.403 Factors Affecting Allowability of Costs, costs must be consistently charged as either indirect or direct costs but may not be double charged or inconsistently charged as both. If chosen, this methodology once elected must be used consistently for all federal awards until such time as a non-federal entity chooses to negotiate for a rate, which the non-federal entity may apply to do at any time. For more information, see 2 CFR Part 200.414.


9. Documentation of Non-profit and/or Public Status

The applicant and any proposed subrecipient must provide documentation of non-profit and/or public status. Any of the following constitutes acceptable proof of non-profit status:

- a. A reference to the applicant organization's listing in the Internal Revenue Service's (IRS) most recent list of tax-exempt organizations described in section 501(c)(3) of the IRS Code.
- b. A copy of a currently valid IRS tax exemption certificate.
- c. A statement from a state taxing body, State attorney general, or other appropriate State official certifying that the applicant organization has a non-profit status and that none of the net earnings accrue to any private shareholders or individuals.
- d. A certified copy of the organization's certificate of incorporation or similar document that clearly establishes non-profit status.
- e. Any of the items in the subparagraphs immediately above for a State or national parent organization and a statement signed by the parent organization that the applicant organization is a local non-profit affiliate.
- f. A signed statement on official letterhead by an official authorized to apply for grant funds on behalf of the public entity will suffice.

Attach documentation of non-profit and/or public status to the application package.

APPENDIX B: FY 2023 CINAS APPLICANT CHECKLIST

	Ineligible if Missing ¹¹	Non-Responsive if Missing ¹²	Required or Requested Attachments
Forms:			
		X	Form SF-424, Application for Federal Assistance
		X	Form SF-424A, Budget
		X	Form SF-424B, Assurances for Non-Construction Programs
		X	Certification Regarding Lobbying, as applicable
Other Documents:			
			Project Abstract (single-spaced, 5 page maximum)
	X		Project Narrative that clearly states applicants and proposed subrecipients previous experience with citizenship preparation services
			Curriculum outline or syllabus
			Résumés of key personnel or position descriptions for vacant key positions
			Organizational chart for the applicant and any subrecipients
	X		Memorandum of Understanding (MOU) with subrecipient(s), signed by all parties (if applicable)
	X		Program Goals Chart
		X	Budget Table and Narrative (for applicant and subrecipient)
			Negotiated Fringe Benefit Agreement (if applicable)
			Indirect Cost Agreement (if applicable)
			Documentation of non-profit and/or public status (for applicant and proposed subrecipients)

¹¹ USCIS will not review if missing.¹² DHS will not review if missing.

APPENDIX C: USCIS RESOURCES FOR CITIZENSHIP EDUCATION PROGRAMS

Educators and volunteers play a critical role in helping immigrants prepare for U.S. citizenship. The USCIS Citizenship Resource Center provides an array of resources and materials to support educators and programs working to prepare immigrants for the naturalization process. Below are a few key resources that all programs should be familiar with. For a full list of resources, please visit the Citizenship Resource Center at uscis.gov/citizenship.

[USCIS Adult Citizenship Education Program Development Guide: Building an Adult Citizenship Program](#)

This program development guide outlines a step-by-step process to create or sustain an adult citizenship education program and includes products and resources from U.S. Citizenship and Immigration Services (USCIS) for use at each stage of program development

[Elements of Program Quality for Adult Citizenship Education](#)

This document provides a general framework for preparing permanent residents for the civics and English components of the naturalization interview and test.

[USCIS Guide to Creating an Adult Citizenship Education Curriculum](#)

This guide assists adult education program administrators and teachers in developing a citizenship curriculum and thematic lessons, choosing textbooks and supplemental materials, and creating effective learning activities.

[Adult Citizenship Education Sample Curriculum for a High Beginning ESL Level Course](#)

This publication outlines the components, structure, and process involved with creating an adult citizenship education curriculum.

Additional Citizenship Education Resources:

- [Resources for Educators About the Naturalization Process](#)
- [Prepare Students for the Interview and Test](#)
- [Learn New Teaching Techniques](#)
- [Start a Citizenship Program](#)
- [Promote a Citizenship Program](#)
- [Train and Develop Staff](#)

APPENDIX D: FY 2023 CINAS GRANT GLOSSARY

TERM	DEFINITION
Attorney	Any person who is eligible to practice law in and is a member in good standing of the bar of the highest court of any state, possession, territory, or commonwealth of the United States, or of the District of Columbia, and is not under any order suspending, enjoining, restraining, disbaring, or otherwise restricting him or her in the practice of law. See 8 CFR Part 1.2 .
Authorized practice of immigration law	Occurs when an authorized and qualified individual or organization provides accurate and current legal advice on immigration-related matters. Typically, this is limited to DOJ-accredited representatives who work for DOJ-recognized organizations or to an attorney who is a member in good standing of the bar of a U.S. state. See 8 CFR Part 292 , 8 CFR Part 103.2(a)(3) , and 8 CFR Part 1.2 .
Citizenship Instruction	Educational services that provide enrolled Lawful Permanent Residents (LPR's) with the skills and knowledge needed to prepare for citizenship, including instruction in English as a Second Language (ESL), U.S. history and government, and the naturalization process.
Citizenship Preparation Services	Services that help prepare Lawful Permanent Residents for naturalization, including citizenship instruction and naturalization application services.
Civics-based ESL	Civics-based ESL focuses more heavily on teaching the English structures needed to understand the concepts found within the naturalization test as well as those to assist students to become more integrated community members (this is targeted at program beneficiaries assessed at NRS level 2 – low beginning ESL).
Civics-based Literacy	Civics-based literacy includes using civics and integration concepts and themes to teach low-level students' basic English grammar and vocabulary preparing them for civics-based ESL (this is targeted at program beneficiaries assessed at National Reporting System for Adult Education (NRS) level 1 – beginning ESL literacy).
Class cycle	The time period, such as a term or semester, when classes are held on a frequent or regular basis. This time period has a beginning and end date.

TERM	DEFINITION
Cognizant agency for indirect costs	<p>The Federal agency responsible for reviewing, negotiating, and approving cost allocation plans or indirect cost proposals developed under this part on behalf of all Federal agencies. The cognizant agency for indirect cost is not necessarily the same as the cognizant agency for audit. For assignments of cognizant agencies see the following:</p> <ul style="list-style-type: none"> (1) For Institutions of Higher Education (IHEs) (2) For nonprofit organizations (3) For State and local governments (4) For Indian tribes
Cost sharing or matching	<p>The portion of the project costs not paid by federal funds or contributions (unless otherwise authorized by Federal statute).</p>
Citizenship Instruction	<p>Educational services that provide enrolled Lawful Permanent Residents (LPR's) with the skills and knowledge needed to prepare for citizenship, including instruction in English as a Second Language (ESL), U.S. history and government, and the naturalization process.</p>
Citizenship Preparation Services	<p>Services that help prepare Lawful Permanent Residents for naturalization, including citizenship instruction and naturalization application services.</p>
Direct costs	<p>Costs that can be identified specifically with a particular sponsored project or an institutional activity, or easily assigned to activities with a high degree of accuracy. Examples include the salaries of staff assigned to a specific project, materials and supplies, and travel. For more information, see 2 CFR Part 200.413.</p>
DOJ accreditation	<p>A program allowing a specially qualified non-lawyer to represent noncitizens on behalf of a recognized organization.</p> <p>Please refer to the links below for additional information:</p> <p>Recognition of Organizations and Accreditation of Non-Attorney Representatives</p> <p>https://www.justice.gov/eoir/recognition-and-accreditation-program</p>

TERM	DEFINITION
DOJ-accredited representative	<p>A representative is “accredited” when the Executive Office for Immigration Review’s (EOIR) Office of Legal Access Programs gives permission to a specially qualified non-lawyer to represent noncitizens on behalf of a recognized organization. There are two kinds of accreditation: “partial” and “full.” A partially accredited representative may represent noncitizens before the Department of Homeland Security (DHS) only. A fully accredited representative may represent noncitizens before both DHS and EOIR, which includes the immigration courts and the Board of Immigration Appeals (BIA).</p>
DOJ-recognized organization (DOJ recognition)	<p>A nonprofit organization that has permission from the Executive Office for Immigration Review’s (EOIR) Office of Legal Access Programs to practice immigration law through accredited representatives.</p> <p>An organization is “recognized” when the Office of Legal Access Programs gives a non-profit organization in the United States permission to practice immigration law through accredited representatives before DHS only (partial accreditation) or DHS and EOIR (full accreditation). EOIR includes the immigration courts and the Board of Immigration Appeals (BIA). By regulation, a nonprofit, federal tax-exempt, religious, charitable, social service, or similar organization established in the United States that has been approved for recognition is called a recognized organization.</p> <p>Visit the DOJ’s Recognition and Accreditation Program page to learn how an organization can apply for recognition and accreditation.</p>
Employee	<p>A person who provides services to an employer in exchange for compensation and who does not provide these services as part of an independent business. The term does not include board members or contracted individuals. The following factors of a job arrangement may indicate that an individual is an employee:</p> <ol style="list-style-type: none"> The employer pays the individual; The employer may fire the individual; The employer provides the individual with tools or equipment and a place to work; The employer trains the individual; The individual is required to follow the employer’s instructions; The employer sets or can set the individual’s work hours; The employer restricts the individual from working for others; and Other applicable factors.

TERM	DEFINITION
Employer	In the context of this notice of funding opportunity, an employer is an organization with public or non-profit status that has the ability to hire, pay, fire, supervise, or otherwise control the work of an employee.
EOIR	An abbreviation for the Executive Office for Immigration Review (EOIR), which is an agency within the Department of Justice (DOJ). Under delegated authority from the Attorney General, immigration judges and the Board of Immigration Appeals, EOIR's appellate component, interprets and adjudicates immigration cases according to United States immigration laws. Within EOIR, the Office of Legal Access Programs administers the program that grants recognition to organizations and accreditation of their representatives.
Form G-28, Notice of Entry of Appearance as Attorney or Accredited Representative	The form that attorneys and accredited representatives use to provide information establishing their eligibility to appear and act on behalf of an applicant, petitioner, or respondent before USCIS. Form G-28 is available at uscis.gov/g-28 .
Form N-400, Application for Naturalization	The form used to apply for U.S. citizenship. Form N-400 is available at uscis.gov/n-400 .
Form N-648, Medical Certification for Disability Exceptions	The form for applicants who seek an exception to the English and civics testing requirements for naturalization because of physical or developmental disability or mental impairment. Form N-648 is available at uscis.gov/n-648 .
Form I-912, Request for a Fee Waiver	The USCIS form used by applicants and petitioners to request a waiver for certain application processing fees. Form I-912 is available at uscis.gov/i-912 .
Fringe benefits	Allowances and services provided by employers to their employees as compensation in addition to regular salaries and wages.
Fringe benefit rate	The value of fringe benefits expressed as a percentage of salary. Calculate the dollar amount by applying the appropriate fringe benefit percentage rate to each employee's salary to be charged to the project. For more information, see OMB Circular A-21, OMB Circular A-87, or OMB Circular A-122.
Fringe benefit rate agreement	An agreement that has been approved by a cognizant federal agency (usually the agency that provides the most funding to the grant recipient)

TERM	DEFINITION
	that establishes the rate at which an organization will request reimbursement for fringe benefits under the grant program.
FY	An abbreviation for fiscal year. The federal government’s fiscal year runs from October 1st to September 30th.
Indirect (facilities & administrative (F&A)) costs	Those costs incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. To facilitate equitable distribution of indirect expenses to the cost objectives served, it may be necessary to establish a number of pools of indirect (F&A) costs. Indirect (F&A) cost pools must be distributed to benefitted cost objectives on bases that will produce an equitable result in consideration of relative benefits derived.
Indirect cost rate proposal	The documentation prepared by a non-Federal entity to substantiate its request for the establishment of an indirect cost.
In-kind contribution	The value of non-cash contributions (such as property or services) that: <ol style="list-style-type: none"> 1. Benefit a federally assisted project or program; and 2. Are provided for free by non-federal third parties to a recipient, sub-recipient, or cost-type contractor under the award.
Key Personnel	Key personnel is defined as any person (employee/volunteer) who is paid by the grant and whose work is integral to the goals of the grant program. Key personnel may include; attorney, grant/program manager, BIA accredited representative, instructor, etc., this list is not exhaustive.
Legal advice	A legal opinion or recommendation offered as a guide to action and based on applying the law to a given set of facts.
Memorandum of Understanding (MOU)	A formal agreement between parties that defines each party’s rights and responsibilities.
National Reporting System (NRS)	An outcome-based reporting system developed by the U.S. Department of Education for state-administered, federally funded adult education programs. For more information, see this list of NRS test benchmarks for educational functioning levels.

TERM	DEFINITION
Nationally normed standardized assessment test	In the context of citizenship instruction, this refers to specific tests used to determine a student’s English language proficiency. The Department of Education has a list of approved standardized tests .
Naturalization application services	Legal services, provided within the scope of the authorized practice of immigration law, that help immigrants go through the naturalization application and interview process. Services may include naturalization eligibility screening, legal advice, Form N-400 preparation and submission, and interview preparation.
Naturalization eligibility screening	A systematic assessment conducted by an attorney or BIA-accredited representative to determine if an individual is eligible to apply for U.S. citizenship. Eligibility screenings include legal advice.
Non-duplicated citizenship students	A student enrolled in a grant-funded citizenship class for the first time. A program cannot count a student as newly enrolled more than once during the grant performance period, even if the student enrolls in multiple classes.
Nonprofit organization	Any corporation, trust, association, cooperative or other organization which: <ul style="list-style-type: none"> a. Operates primarily for scientific, educational, service, charitable or similar purposes in the public interest; b. Is not organized primarily for profit; and c. Uses its net proceeds to maintain, improve and/or expand its operations.
Non-responsive application	An application that does not meet one or more of the requirements listed under Eligibility Information – Non-Responsive Applications in the notice of funding opportunity. We will not review applications that are non-responsive.
Partner organization	Grant applicants may include a partner organization in their proposal. The partner may provide a portion of the direct services or some other contribution to the applicant’s proposed grant project. A partner organization is considered a “subrecipient” if the organization will receive a portion of the grant funding to provide additional or complementary direct services. The partner organization may provide citizenship instruction, naturalization application services, or both.

TERM	DEFINITION
Period of performance	The total estimated time interval between the start of an initial Federal award and the planned end date, which may include one or more funded portions, or budget periods. Identification of the period of performance in the Federal award per § 200.211(b)(5) does not commit the awarding agency to fund the award beyond the currently approved budget period.
Private practice	To engage in one's profession as an independent provider rather than as an employee.
Pro bono attorney	An attorney who provides legal services voluntarily and without payment as a public service.
Qualified Citizenship Instructor	Under the CIGP, a qualified instructor is one with a degree in education (K-12 Social Studies, English Language Arts, History, Linguistics, Teaching English to Speakers of Other Languages (TESOL), or Adult Education) or someone with at least one year of experience as the lead teacher in a class for adult immigrants. Although not a requirement, programs whose instructors have the following education, certification, and/or experience are generally more likely to be scored higher than programs that do not: <ul style="list-style-type: none"> a.) Hold a degree in TESOL; b.) Hold TESOL certification from a state licensing agency; or c.) Have a minimum of two years of experience in TESOL instruction in a classroom setting for an adult education program that utilizes a textbook and a structured curriculum.
Qualified Legal Service Provider	Under the CIGP, a qualified legal service provider is one of the following: <ul style="list-style-type: none"> a.) A U.S. Department of Justice (DOJ) Accredited Representative serving a DOJ Recognized Organization. Partial accreditation is permitted; or b.) An attorney who is an employee of the applicant or the proposed subrecipient organization. <ul style="list-style-type: none"> 1.) Attorneys working under this grant must have training in immigration law and be able to provide legal representation to clients. 2.) Hours charged to the grant should be in alignment with the goals of the application. 3.) Pro bono or volunteer attorneys may be used to supplement the program but may not:

TERM	DEFINITION
	<ul style="list-style-type: none"> i. Serve as the applicant’s sole provider of immigration legal services; or ii. Serve as a supervisor to staff members who provide naturalization application services but who are not qualified legal service providers.
Quarter	<p>There are four quarters in a fiscal year. The quarterly dates are as follows:</p> <p>Quarter 1: October 1 to December 31</p> <p>Quarter 2: January 1 to March 31</p> <p>Quarter 3: April 1 to June 30</p> <p>Quarter 4: July 1 to September 30</p>
Representation	Includes “practice” and “preparation” as defined in 8 CFR Part 1.2 .
Subrecipient	An entity, usually but not limited to non-Federal entities, that receives a subaward from a pass-through entity to carry out part of a federal award; but does not include an individual that is a beneficiary of such award. A subrecipient may also be a recipient of other Federal awards directly from a federal awarding agency. Under USCIS grant program applicants must include a Memorandum of Understanding signed by the applicant and potential subrecipient. Potential subrecipients must also have a UEI number.
Subcontract	A legal contract in which the grant recipient hires an individual, business or organization to do a specific task or set of tasks. Subcontracting is permitted under the Citizenship and Integration Grant Program, but applicants may <i>only</i> propose a subcontract for specific tasks, such as hiring additional citizenship instructors on a contractual basis. Applicants may not enter into a subcontract with a private attorney. Applicants must demonstrate their ability to successfully manage all aspects of the grant-funded project, including financial management.
Unique Entity Identifier (UEI)	A unique nine-character identification number requested in, and assigned by, the System for Award Management (Sam.gov). Organizations must request a UEI prior to applying for this funding opportunity.

EXHIBIT M

**The U.S. Department of Homeland Security (DHS)
Notice of Funding Opportunity (NOFO)
Fiscal Year 2023 Citizenship and Integration Grant Program
Community and Regional Integration Network Grant**

All entities wishing to do business with the federal government must have a unique entity identifier (UEI). The UEI number is issued by the SAM system. Requesting a UEI (Sam.gov) information can be found at: <https://sam.gov/content/entity-registration>.

Grants.gov registration information can be found at:
<https://www.grants.gov/web/grants/register.html>.

Planned UEI Updates in Grant Application Forms

On April 4, 2022, the Data Universal Numbering System (DUNS) Number was replaced by a new, non-proprietary identifier requested in, and assigned by, the System for Award Management (SAM.gov). This new identifier is the Unique Entity Identifier (UEI). Additional Information can be found on Grants.gov: <https://www.grants.gov/web/grants/forms/planned-uei-updates.html>

A. Program Description

1. Issued By

U.S Department of Homeland Security (DHS), U.S. Citizenship and Immigration Services (USCIS), External Affairs Directorate (EXA), Office of Citizenship, Partnership and Engagement (OCPE)

2. Assistance Listings Number

97.010

3. Assistance Listings Title

Citizenship Education and Training

4. Funding Opportunity Title

FY 2023 Citizenship and Integration Grant Program: Community and Regional Integration Network Grant (CARING)

5. Funding Opportunity Number

DHS-23-CIS-010-003

6. Authorizing Authority for Program

H.R. 2617 – Consolidated Appropriations Act, 2023 (Pub. L. 117-328) Division F, Title IV

7. Appropriation Authority for Program

H.R. 2617 – Consolidated Appropriations Act, 2023 (Pub. L. 117-328) Division F, Title IV

8. Announcement Type

Initial

9. Program Overview, Objectives, and Priorities

a. Overview

OCPE is charged with promoting instruction and training on the rights and responsibilities of citizenship. USCIS recognizes that naturalization is a key milestone in the civic integration of immigrants. Naturalization requirements, such as knowledge of English and U.S. history and government, encourage civic learning and build a strong foundation upon which immigrants can fully integrate into American society. Through preparing for naturalization, immigrants gain tools to become successful citizens and meet their responsibilities as United States citizens.

The goal of the Citizenship and Integration Grant Program is to expand the availability of high-quality citizenship preparation services for immigrants across the nation and to provide opportunities for immigrants to gain the knowledge and skills necessary to integrate into the fabric of American society.

Since it began in 2009, the Citizenship and Integration Grant Program has awarded more than \$132 million through 579 competitive grants to immigrant-serving organizations in 39 states and the District of Columbia. Now in its 15th year, the program has helped more than 300,000 immigrants prepare for citizenship. The Citizenship and Integration Grant Program supports the objectives of [Executive Order 14012, Restoring Faith in Our Legal Immigration Systems and Strengthening Integration and Inclusion Efforts for New Americans](#) and the U.S. Department of Homeland Security's [Strategic Plan for Fiscal Years 2020-2024](#) by promoting integration, inclusion, and citizenship.

The Citizenship and Integration Grant Program also addresses the DHS mission to enforce and administer our immigration laws (captured in the [Third Quadrennial Homeland Security Review](#)) and USCIS' [mission and values](#), as the program provides immigrants instruction on the rights and responsibilities of U.S. citizenship and information and support on how to apply for naturalization within the authorized practice of immigration law.

The *Community and Regional Integration Network Grant (CARING)* funding opportunity supports organizations providing extended civic integration services to vulnerable immigrant populations. These integration services build upon, but are not intended to replicate, resettlement services funded by the U.S. Department of State and the U.S. Department of Health and Human Services.

b. Objectives

In fiscal year (FY) 2023, approximately \$1 million in federal funding is available for eligible organizations to provide integration services to vulnerable immigrant populations (please note that throughout this document, the specific immigrant populations included in this program, as outlined in Appendix D, will be referred to as “program participants” or “program participant” in the singular). USCIS seeks to award approximately three grants of up to \$300,000 each.

Proposed services **must** include all three of the following components:

a. Integration Services:

Grant recipients will assess each program participant’s integration needs and then formulate individualized integration plans. Grantees will also be responsible for the provision of or referral to integration services, and for monitoring the progress of the integration plans.

b. Citizenship Instruction Services:

Grant recipients will offer civics-based literacy instruction, civics-based English as a Second Language (ESL) instruction, or citizenship instruction to provide enrolled immigrants with the skills and knowledge needed to prepare for citizenship.

c. Naturalization Application Services:

Within the scope of the authorized practice of immigration law, grant recipients will assist qualified program participants in preparing and submitting a Form N-400, Application for Naturalization, preparing for the naturalization interview, and providing ongoing case management as needed.

For detailed information on the three mandatory program components, see below Section C.2, Eligibility Information.

c. Priorities

Certain immigrants, such as those who entered the United States through USCIS’ humanitarian programs, may experience unique challenges with civic, linguistic, economic, cultural, and institutional integration when resettling in the United States, which may impact their progress toward full civic integration. It is critical to provide vulnerable immigrant populations with opportunities to gain the knowledge and skills necessary to fully integrate into American society.

Immigrants who entered the United States or adjusted status in one of the following categories are eligible for services under this program:

- Refugees;
- Asylees;
- Cuban or Haitian entrants;
- Victims of human trafficking or criminal activity;
- Abused spouses, children, or parents of U.S. citizens; and
- Special Immigrant Juveniles (SIJs)
- Individuals on a Special Immigrant Visa (SIV)¹

For a comprehensive list of classes of admission included in this funding opportunity, please see Appendix D. This grant program strives to promote the long-term civic integration of vulnerable immigrants who have identified naturalization as a goal yet need additional support and instruction to attain it.

Partnerships

Partnerships are encouraged to ensure that the largest array of integration services are available to participants. Applicants may include partnerships with other public or non-profit organizations in their proposal. The principal applicant must directly provide integration services, citizenship instruction, and/or naturalization application services. A partner organization is a “subrecipient” if the organization will receive a portion of the grant funding to provide additional or complementary services within the scope of this grant.

The principal applicant must complete a Memorandum of Understanding (MOU) with the prospective subrecipient and submit it with the application. The principal applicant must clearly demonstrate how it will monitor the prospective subrecipient’s performance and ensure that the prospective subrecipient complies with all grant award conditions and data reporting requirements. The MOU must state the minimum number of program participants to whom the subrecipient will provide services and how grant funding will be allocated to fund the services. Prospective subrecipients must have their own individual UEI number and will be responsible for financial and performance reporting. Subrecipients are responsible for submitting their reports to the principal applicant for submission to DHS.

If the principal applicant partners with an organization that does not receive a portion of the grant funding, the principal applicant should still complete an MOU. However, the principal applicant does not need to include the other required information listed above for the subrecipient and the partner organization does not need an individual UEI.

¹ For additional information on vulnerable immigrant populations see the U.S. Department of Health & Human Services Fact Sheet: <https://www.acf.hhs.gov/orr/programs/refugees/factsheets>

10. Performance Measures

For this grant program, performance will be evaluated based on the following metrics:

- a. Cumulative percentage of enrolled students who post-test using nationally approved standardized tests suitable to assess English language proficiency (minimum of 80%);
- b. Cumulative percentage of post-tested students demonstrating measurable educational gains (minimum 80%).
- c. Four performance metrics for which the minimum goals vary based on funding level, as described in the chart below.
 - 1) Number of program participants for whom the organization will develop, implement, and monitor integration plans;
 - 2) The number of newly enrolled non-duplicated participants in citizenship instruction classes;
 - 3) Number of program participants for whom the organization will conduct naturalization eligibility screenings; and
 - 4) Number of program participants for whom the organization will prepare and file a Form N-400 and a Form G-28, Notice of Entry of Appearance as Attorney or Accredited Representative.

Minimum Performance Goals for Two-Year Period of Performance					
Funding Level		Number of integration plans developed and monitored	Newly enrolled non-duplicated immigrants in civics-based literacy, civics-based ESL, or citizenship instruction classes	Immigrants receiving naturalization eligibility screening	Immigrants filing Forms N-400 and G-28
From	To				
\$270,000	\$300,000	135	135	90	90
\$240,000	\$269,999	120	120	80	80
\$210,000	\$239,999	110	110	70	70
\$180,000	\$209,999	90	90	60	60
\$150,000	\$179,999	80	80	50	50

B. Federal Award Information

- | | |
|---|--------------|
| 1. Available Funding for the NOFO: | \$900,000.00 |
| 2. Projected Number of Awards: | 3 |
| 3. Maximum Award Amount | \$300,000 |
| 4. Period of Performance: | 24 months |

Note: extensions are permitted. See Section H, Additional Information, Period of Performance Extensions, for more information.

- | | |
|--|------------|
| 5. Projected Period of Performance Start Date(s): | 10/01/2023 |
| 6. Projected Period of Performance End Date(s): | 09/30/2025 |
| 7. Funding Instrument Type: | Grant |

C. Eligibility Information

1. Eligible Applicants

The following entities are eligible to apply as a principal applicant or potential subrecipient to this announcement:

- a. City or township governments
- b. County governments
- c. Independent school districts
- d. Indian/Native American tribal governments (federally recognized)
- e. Indian/Native American tribal organizations (other than federally recognized tribal governments)
- f. Indian/Native American Tribally Designated Organization
- g. Public/Indian Housing Authority
- h. Nonprofits with 501(c)(3) IRS status, other than institutions of higher education
- i. Private institutions of higher education
- j. Public & state-controlled institutions of higher education
- k. Special district governments
- l. State governments

2. Applicant Eligibility Criteria

Applicants are required to demonstrate experience with, and extensive knowledge of the particular community they propose to serve and must describe how the proposed program design will address the identified integration needs of this population.

Applicants are required to propose a program that provides a suite of integration services

to vulnerable immigrant populations that will promote long-term civic integration. Through support with integration, citizenship education, and naturalization application services, those served under the program will gain tools required to become successful citizens.

Applicants and any proposed subrecipients **must** demonstrate recent experience with the provision of citizenship preparation services. Specifically, at least one year of experience within the past three years:

- Providing civic integration services;
- Providing literacy, ESL, or citizenship instruction in a classroom setting (or in a virtual setting since March 2020) that follows a curriculum and utilizes a published textbook; and
- Preparing and filing Forms N-400 and G-28 on behalf of qualified immigrants within the authorized practice of immigration law. See Appendix D for definitions of these terms.

Proposed activities **must** include the following three mandatory components:

a. **Integration Services**

1) **Development of an individual integration plan for each program participant who will receive services.**

The intent of this requirement is to develop an integration road map for program participants who have identified naturalization as a goal, including those who are not yet ready to apply for naturalization and may require interim services to attain the skills and knowledge required for successful citizenship. Each enrolled immigrant should be assessed for English language level and naturalization eligibility and be provided with information on the naturalization process and guidance on what steps are needed to prepare for naturalization. This naturalization-focused assessment should be considered the foundation of the individual integration plan that must be completed for every enrolled program participant, with services and referrals tailored to the specific skills, needs, and literacy level of the individual (e.g., digital literacy, employment goals, family goals, local navigation, etc.). Each program participant must be offered enrollment in civics-based literacy, civics-based ESL, or citizenship instruction classes, as appropriate.

2) **Provision of or referral to integration services that address the specific needs identified in the program participant's individual integration plan.**

Applicants must demonstrate an established network of local service providers for the provision of integration services. Applicants must offer access to a range of services designed to foster long-term integration that are tailored to the specific needs of the target population. Below are some of the types of integration services that may be funded under this grant. Applicants may propose other services based on the identified needs of the communities they propose to serve.

a. **Community orientation and settlement information.**

Building on the information that refugees receive during their initial Reception and Placement Orientation, community orientation and settlement activities include those that allow program participants to expand, reinforce and practice existing knowledge to foster their community participation and understanding of how to navigate local infrastructure and services. Examples of activities include but are not limited to:

- i. Creating/providing a local community resource guide;
- ii. Hosting local leaders or representatives of community services or civic organizations as guest speakers; and
- iii. Community based events and tours.

b. Referrals to and interactions with local government and public institutions.

There are many community-based integration support services to assist vulnerable immigrant populations. Programs should be aware of these existing services and develop plans to collaborate with the local government, and public and private institutions that would most benefit their program participants. Programs can develop lesson plans in conjunction with entities to teach program participants about their role in the community and the services they offer, invite guest speakers to speak to program participants, and arrange for program participants to have meaningful interaction with community partners.

Such institutions include, but are not limited to: (a) public libraries, (b) the Department of Motor Vehicles, (c) community centers and/or chambers of commerce, (d) law enforcement agencies, (e) health clinics, (f) employment services and or local small businesses, (g) public schools, (h) emergency management agencies, (i) historical museums, (j) community colleges, and (k) interfaith institutions, etc.

c. Referrals to employment training.

Referrals to employment training may be to programs or classes that help program participants acquire workplace-specific knowledge or skills to improve performance, increase chances of advancement, or prepare program participants for future career goals as identified in their individual integration plan. Grant funds may not be used to pay the costs for individual employment training.

d. Referrals to appropriate sources for updating or renewing previously held foreign professional credentials.

Organizations may make referrals for those program participants who have identified the goal of employment in their pre-immigration career fields. Assistance may be in the form of written information or guidance, facilitating a mentoring relationship between the program participant and a volunteer with experience in the same field, or referrals to agencies or professional

organizations that assist individuals to recertify or obtain the required professional credentials to re-enter their chosen field. Grant funds may not be used to pay for the costs of individual re-certification or re-credentialing services for program participants.

3) **Monitoring the Progress of Integration Plans**

Applicants must track program participants progress with their integration plans, helping if participants have difficulty accessing any integration services and revising plans if circumstances change.

b. **Citizenship Instruction Services** to prepare immigrants for the naturalization process. Programs must include:

1. **Instruction** in one the following content areas:

a. **Civics-based Literacy and Civics-based ESL Instruction**

Program participants whose English level is not at the appropriate level for citizenship instruction classes should be served through civics-based literacy and/or civics-based ESL instruction. General life skills (non-civics based) ESL is not allowable under this grant. The Office of Citizenship defines civics-based literacy and civics-based ESL instruction as ESL classes that provide students with the English language grammar and vocabulary needed to advance through the stages of integration with the ultimate goal of naturalization. These categories of instruction are appropriate for individuals who do not have sufficient English language attainment to be placed in a citizenship class that focuses on preparation for the naturalization interview and test.

- i. **Civics-based literacy** includes using civics vocabulary preparing them for civics-based ESL. This is targeted at program participants assessed at the [National Reporting System for Adult Education](#) (NRS) beginning literacy to high intermediate levels (NRS Levels 1-6).
- ii. **Civics-based ESL** focuses more heavily on teaching the English structures needed to understand the concepts found within the naturalization test as well as those to assist students to become more integrated community members. This is targeted at program participants assessed at NRS low beginning literacy to high intermediate levels (NRS Levels 2-6)

b. **Citizenship Instruction**

Students may start in lower-level classes as described above and progress to citizenship instruction. Students assessed at the NRS high beginning level or higher (NRS Levels 3 – 6) should be provided with citizenship instruction in the following content areas:

- i. ESL instruction in reading, writing, and speaking;

- ii. U.S. history and government instruction primarily delivered in English for test preparation and the promotion of civic integration;² and
 - iii. The naturalization process and eligibility interview, with instruction primarily delivered in English.
2. **A Course Curriculum** including all components outlined in the [USCIS Guide to Creating an Adult Citizenship Education Curriculum](#):
- a. Instruction in U.S. history and government for test preparation and the promotion of civic integration;
 - b. Activities that promote civic and linguistic integration;
 - c. English as a Second Language (ESL) instruction in reading, writing, and speaking for the naturalization test, naturalization process, and to conduct required integration activities;
 - d. Instruction on the naturalization interview and Form N-400; and
 - e. Instruction on the rights and responsibilities of citizenship, including information on voting rights and responsibilities, how to register to vote after becoming a citizen, the basics of becoming an informed voter, and the penalties for voting before becoming a citizen under Division C of PL 104–208, 110 Stat. 3009-546.³
3. **Course Textbooks** that align with the skill level of the students in the class:
- a. Published hardcopy only, compilations of worksheets or handouts will not be accepted; and
 - b. All students must be issued a textbook for their own personal use.
4. **Standardized ESL Assessments:** The use of a nationally normed NRS-approved standardized test of English proficiency to place and assess progress of all students enrolled under this program:
- a. At least 80% of enrolled students must participate in post-testing; and
 - b. At least 80% of post-tested students must demonstrate educational gains as evidenced by increased standardized test scores.
 - c. USCIS provides grant recipients with free copies of the Assessment for Adult Citizenship Education (AACE). We strongly encourage but do not require recipients to use the AACE to assess civics learning gains in addition to the ESL assessment.

² Some instruction in languages other than English may be provided under the program to immigrants who qualify for exemptions to the English language naturalization requirements. Grant recipients who provide such instruction must still provide the minimum number of immigrants with grant-funded citizenship instruction in English over the two-year period of performance.

³ <https://www.congress.gov/104/plaws/publ208/PLAW-104publ208.pdf>

5. **Course Structure:** The provision of at least 40 hours of civics-based literacy, civics-based ESL, or citizenship instruction over a 9 to 12-week class cycle with managed enrollment at the NRS low beginning to high intermediate levels (NRS Levels 1-6);
 - a. Additional information about NRS levels is available on the [National Reporting System for Adult Education](#) website;
 - b. Tutoring services do not count toward the minimum 40 hours of classroom instruction; and
 - c. Traditional ESL or literacy classes that lack a civics education focus may not be funded under this program.

6. **Qualified Instructors:** Qualified citizenship instructors must have degrees in education (K-12 Social Studies, English Language Arts, History, Linguistics, Teaching English to Speakers of Other Languages (TESOL), or Adult Education) and/or who have at least one year of experience as the lead teacher in a class of adult immigrants. Although not a requirement, programs whose instructors have the following education, certification, and/or experience are generally more likely to be scored higher than programs that do not:
 - a. Hold a degree in TESOL;
 - b. Hold TESOL certification from a state licensing agency; and/or
 - c. Have a minimum of two years of experience in TESOL instruction in a classroom setting for an adult education program that utilizes a textbook and a structured curriculum.

7. **Integration Activities:** The intent of this requirement is to encourage program participants to extend knowledge acquisition beyond traditional classroom instruction through opportunities to experience and navigate American civic life firsthand through in-depth learning activities. Applicants are encouraged to draw upon their local resources, venues, and landmarks when conceptualizing and designing these civic integration learning activities. Suggested categories for the required integration activities include but are not limited to:
 - a. Site-based civic integration activities – Local trips outside the classroom to sites and landmarks of historical and/or cultural significance, libraries, museums, other local public entities, and organizations that promote public safety, etc.
 - b. Classroom-based civic integration activities – Activities that may involve guest speakers such as local civic leaders, public servants, or program alumni to provide the opportunity for student interaction and exchange, or the use of multimedia and/or materials-based methods that promote an enhanced understanding of key moments in U.S. history and/or the form and function of local, state, and federal government;
 - c. Civic participation – Activities that encourage students to take participatory learning beyond the classroom by attending a public meeting, volunteering, or participating in local civic institutions; and
 - d. Other integration activities – Activities that promote in-depth understanding of the student’s role as a future citizen of the United States, including the

rights and responsibilities of citizenship; our shared American history; government functions, structure, and laws; geography; and traditions, symbols, and holidays. These can be external or in-class.

8. **Service Delivery:** Applicants are required to primarily provide in-person instruction. However, applicants may supplement in-person classes with virtual classes if it allows them to extend the reach of their services. Additionally, applicants must be prepared to pivot to virtual or hybrid instruction if public health restrictions limit in-person gatherings.

For more detailed information on the content and competencies that applicants are required to address in grant-funded classes, please review the [USCIS Guide to Creating an Adult Citizenship Education Curriculum](#) and the [Adult Citizenship Education Sample Curriculum for a High Beginning ESL Level Course](#).

- c. **Naturalization Application Services,** within the scope of the authorized practice of immigration law, to support immigrants in the naturalization application and interview process. Grantees are encouraged to use and promote the use of [myUSCIS](#) for filing Forms N-400. Grantees may not provide naturalization application services to immigrants who have not undergone an integration assessment and who do not have an integration plan. Programs must include:

1. **Qualified Legal Service Providers:**

A qualified legal service provider includes one of the following:

- a.) A U.S. Department of Justice (DOJ) Accredited Representative serving a DOJ Recognized Organization. Partial accreditation is permitted; or
- b.) An attorney who is an employee of the applicant or the subrecipient organization.
 - 1.) Attorneys working under this grant must have training in immigration law and be able to provide legal representation to clients.
 - 2.) Hours charged to the grant should be in alignment with the goals of the application.
 - 3.) Pro bono or volunteer attorneys may be used to supplement the program but may not:
 - i. Serve as the naturalization applicant's sole provider of immigration legal services; or
 - ii. Serve as a supervisor to staff members who provide naturalization application services but who are not qualified legal service providers.

The organization must demonstrate an established process to refer individuals with complex immigration matters beyond the scope of the services provided under this grant to a qualified attorney.

2. **Eligibility Screenings** must include an assessment of each program participant's:

- a. Ability to meet the educational requirements of naturalization; and
- b. Ability to meet other legal requirements of naturalization.
- c. For more information, see the [USCIS Naturalization Eligibility Worksheet](#).

3. Case Management must include:

- a. The preparation and submission of Form N-400, Application for Naturalization;⁴
- b. The preparation and submission of Form G-28, Notice of Entry of Appearance as Attorney or Accredited Representative;⁵
- c. Filing other forms or documents (such as Form N-648, Medical Certification for Disability Exceptions);
- d. Interview preparation;
- e. A representative's appearance at the naturalization interview when applicable;
- f. Responding to a Request for Evidence (RFE) when applicable;
- g. Developing individual integration plans and tracking outcomes of each service and referral for X years from enrollment

4. Service Delivery: Organizations should plan to provide in-person naturalization application services. However, should public health restrictions limit the ability of applicants to offer in-person services, they should have a plan in place to pivot to virtual or hybrid naturalization application services.

3. Other Eligibility Restrictions

For-profit law firms and attorneys in private practice are not eligible to receive funding under this funding opportunity (See the Glossary in Appendix C for the definitions of “representation” and “employee”).

Applicants may apply to multiple funding opportunities, with exceptions noted below. USCIS reserves the right to only fund one award.

Current awardees and sub-awardees under the FY 2022 Citizenship and Integration Grant Program (funding opportunities DHS-22-CIS-010-002 and DHS-22-CIS-010-003) are not eligible to receive funding under this funding opportunity.

⁴ Grantees are strongly encouraged to file forms electronically whenever possible. In the case that e-filing is not a viable option, the grantee's legal service provider is required to mail the naturalization application package to USCIS on behalf of the client. Applications may not be given to the client to mail.

⁵ At grant-supported group processing events, a Form G-28 may not be required if the *pro bono* attorney filling out the Form N-400 determines that the services provided would not be considered “practice” or “preparation”, as those terms are defined in 8 C.F.R.CFR 1.2. Such *pro bono* attorneys, however, will be required to complete the preparer section of the Form N-400.

Subrecipients to DHS-22-CIS-010-02 (Citizenship Instruction and Naturalization Application Services Grant Program) or DHS-22-CIS-010-01 (Regional Hub Grants) are not eligible to receive funding under this funding opportunity.

Applications will be deemed ineligible if:

- Applications lack the following three components: integration services, citizenship education, naturalization application services;
- Recent experience providing naturalization application services within the authorized practice of immigration law is lacking;
- Recent (in the past three years) and extensive (a minimum of one year) experience providing citizenship instruction to the target population (5 points) is lacking;
- Recent (in the past three years) and extensive (a minimum of one year) experience providing literacy or ESL instruction to the target population (5 points) is lacking;
- Recent (in the past three years) experience providing civic integration services, and ability to access a network of local service providers is lacking; or
- A detailed sample integration plan is missing.

Any applicant that does not propose to achieve the minimum performance goals outlined in section A.10 of the funding opportunity announcement is not eligible to receive funding under this funding opportunity.

Any application that does not include all forms listed as required on the Applicant Checklist, located in Appendix B, is not eligible to receive funding under this funding opportunity.

If DHS determines at any point during the review process that an application does not meet the following eligibility requirements, the application will be removed from further consideration.

Non-Responsive Applications

An application will be deemed non-responsive and will be removed from further consideration if:

- a. Form SF-424 – *Application for Federal Assistance* is missing.
- b. Form SF-424A – *Budget* is missing.
- c. Form SF-424B – *Assurances - Non-Construction Programs* is missing.
- d. The applicant's Authorized Organization Representative (AOR) is not registered in SAM.
- e. The application does not include a Budget Narrative and Budget Table.
- f. The application does not include a Project Narrative.

4. Cost Share or Match

There is a **minimum cost share requirement for this program of 10%** of the total requested funding amount. Applicants should clearly identify which budget items are to be supported by federal grant funding and which are to be supported by in-kind contributions and/or other funding sources, along with an estimate of the value of these non-federal funding sources. All proposed costshare contributions must be clearly described in the budget portion of the proposal. Applicants will be scored on this during the technical review.

Acceptable forms of cost share items include:

- Volunteer services: Rates for volunteer services must be consistent with those paid for similar work.
- Employee time: Time of employee's regular rate of pay.
- Supplies: Fair market value of the supplies at the time of donation.
- Cash contributions: Cash value.
- Equipment, building, or land: Fair market value or rental value at the time of application, as established by an independent appraisal.
- Project co-funding: Actual cost incurred.

D. Application and Submission Information

1. Key Dates and Times

- a. **Application Start Date:** 06/09/2023
- b. **Application Submission Deadline:** 07/28/2023 at 11:59PM EST
- c. **Anticipated Award Date:** No later than 09/30/2023

NOTE: The application must be received in Grants.gov by the date and time listed above. If an application is received after the deadline, it will not be considered. Applicants will receive a confirmation from Grants.gov once the application is successfully submitted.

All applications are time stamped by the Grants.gov system when submitted and recipients are notified accordingly. The federal office will download all applications that are received by the deadline date and time as indicated on the NOFO. **Late applications will not be accepted.**

d. Other Key Dates

Event	Suggested Deadline for Completion
Initial Registration at SAM.gov (includes UEI issuance)	Four weeks before actual submission deadline

Obtaining a valid EIN	Four weeks before actual submission deadline
Updating SAM registration	Four weeks before actual submission deadline
Starting application in Grants.gov	One week before actual submission deadline

2. **Agreeing to Terms and Conditions of the Award**

By submitting an application, applicants agree to comply with the requirements of this NOFO and the terms and conditions of the award, should they receive an award.

3. **Address to Request Application Package**

Application, forms and instructions are available at Grants.gov. To access these materials, go to <https://www.grants.gov/>, select “Applicants” then “Apply for Grants. To obtain the application package, select “Download a Grant Application Package.” Enter the Assistance Listing and/or funding opportunity number located on the cover of this NOFO, select “Download Package,” and then follow the prompts to download the application package.

For a hard copy of the full NOFO, please write or fax a request to:

Jacqueline Greely

Grants Officer

CISMailbox@hq.dhs.gov

Fax: 202-447-5600

If you use assistive technology and are unable to access any materials on Grants.gov, please email the Support Center at support@grants.gov.

Applications will be processed through the Grants.gov portal. If you experience difficulties accessing information or have any questions, please call Grants.gov customer support at 1-800-518-4726.

4. **Unique entity identifier and System for Award Management (SAM)**

Each applicant, unless they have a valid exception under 2 CFR 25.110, must:

- 1) Be registered in Sam.Gov before application submission.
- 2) Provide a valid unique entity identifier in its application.
- 3) Continue to always maintain an active SAM registration with current information during the Federal Award process.

5. **Steps Required to Submit an Application, Unique Entity Identifier, and System for Award Management (SAM)**

To apply for an award under this program, all applicants must:

- a. Have an account with <https://login.gov/>;
- b. Register for, update, or verify their SAM account and ensure the account is active before submitting the application;
- c. Create a Grants.gov account;
- d. Add a profile to a Grants.gov account;
- e. Establish an Authorized Organizational Representative (AOR) in Grants.gov;
- f. Submit an application in Grants.gov;
- g. Continue to maintain an active SAM registration with current information, including information on a recipient's immediate and highest-level owner and subsidiaries, as well on all predecessors that have been awarded a federal contract or grant within the last three years, if applicable, at all times during which it has an active federal award or an application or plan under consideration by a federal awarding agency.

Applicants are advised that DHS may not make a federal award until the applicant has complied with all applicable UEI and SAM requirements. Therefore, an applicant's SAM registration must be active not only at the time of application, but also during the application review period and when DHS is ready to make a federal award. Further, as noted above, an applicant's or recipient's SAM registration must remain active for the duration of an active federal award. If an applicant's SAM registration is expired at the time of application, expires during application review, or expires any other time before award, DHS may determine that the applicant is not qualified to receive a federal award and use that determination as a basis for making a federal award to another applicant.

6. Electronic Delivery

DHS is participating in the Grants.gov initiative to provide the grant community with a single site to find and apply for grant funding opportunities. DHS requires applicants to submit their applications online through Grants.gov.

7. How to Register to Apply through Grants.gov

Instructions: Registering in Grants.gov is a multi-step process. Read the instructions below about registering to apply for DHS funds. Applicants should read the registration instructions carefully and prepare the information requested before beginning the registration process. Reviewing and assembling the required information before beginning the registration process will alleviate last-minute searches for required information.

The registration process can take up to four weeks to complete. Therefore, registration should be done in sufficient time to ensure it does not impact your ability to meet required application submission deadlines.

Organizations must have a Unique Entity Identifier (UEI) Number with an active System for Award Management (SAM) registration, and Grants.gov account to apply for grants.

If individual applicants are eligible to apply for this grant funding opportunity, then you may begin with step 3, Create a Grants.gov account, listed below.

Creating a Grants.gov account can be completed online in minutes, but SAM registration may take several weeks. Therefore, an organization's registration should be done in sufficient time to ensure it does not impact the entity's ability to meet required application submission deadlines. Complete organization instructions can be found on Grants.gov here: <https://www.grants.gov/web/grants/applicants/organization-registration.html>.

- a. *Register with SAM:* All organizations applying online through Grants.gov must register with the System for Award Management (SAM). Failure to register with SAM will prevent your organization from applying through Grants.gov. SAM registration must be renewed annually.

For more detailed instructions for registering with SAM, refer to:

<https://www.grants.gov/web/grants/applicants/organization-registration/step-2-register-with-sam.html>.

- b. *Create a Grants.gov Account:* The next step is to register an account with Grants.gov. Follow the on-screen instructions or refer to the detailed instructions here: <https://www.grants.gov/web/grants/applicants/registration.html>.
- c. *Add a Profile to a Grants.gov Account:* A profile in Grants.gov corresponds to a single applicant organization the user represents (i.e., an applicant) or an individual applicant. If you work for or consult with multiple organizations and have a profile for each, you may log in to one Grants.gov account to access all of your grant applications. To add an organizational profile to your Grants.gov account, enter the UEI Number for the organization in the UEI field while adding a profile.

For more detailed instructions about creating a profile on Grants.gov, refer to:

<https://www.grants.gov/web/grants/applicants/registration/add-profile.html>.

- d. *Ebiz POC Authorized Profile Roles:* After you register with Grants.gov and create an Organization Applicant Profile, the applicant's request for Grants.gov roles and access is sent to the Ebiz POC. The Ebiz POC will then log in to Grants.gov and authorize the appropriate roles, which may include the AOR role, thereby giving you permission to complete and submit applications on behalf of the organization. You will be able to submit your application online any time after you have been assigned the AOR role.

For more detailed instructions about creating a profile on Grants.gov, refer to:

<https://www.grants.gov/web/grants/applicants/registration/authorize-roles.html>.

- e. *Track Role Status:* To track your role request, refer to: <https://www.grants.gov/web/grants/applicants/registration/track-role-status.html>.

- f. *Electronic Signature*: When applications are submitted through Grants.gov, the name of the organization applicant with the AOR role that submitted the application is inserted into the signature line of the application, serving as the electronic signature. The Ebiz POC **must** authorize people who are able to make legally binding commitments on behalf of the organization as a user with the AOR role; **this step is often missed, and it is crucial for valid and timely submissions.**

8. How to submit an Application to DHS via Grants.gov

Grants.gov applicants can apply online using Workspace. Workspace is a shared, online environment where members of a grant team may simultaneously access and edit different webforms within an application. For each NOFO, you can create individual instances of a workspace.

Below is an overview of applying on Grants.gov. For access to complete instructions on how to apply for opportunities using Workspace, refer to:

<https://www.grants.gov/web/grants/applicants/workspace-overview.html>.

- a. *Create a Workspace*: Creating a workspace allows you to complete it online and route it through your organization for review before submitting.
- b. *Complete a Workspace*: Add participants to the workspace to work on the application together, complete all the required forms online or by downloading PDF versions, and check for errors before submission. The Workspace progress bar will display the state of your application process as you apply. As you apply using Workspace, you may click the blue question mark icon near the upper-right corner of each page to access context-sensitive help.
- c. *Adobe Reader*: If you decide not to apply by filling out webforms you can download individual PDF forms in Workspace. The individual PDF forms can be downloaded and saved to your local device storage, network drive(s), or external drives, then accessed through Adobe Reader.

NOTE: Visit the Adobe Software Compatibility page on Grants.gov to download the appropriate version of the software at:

<https://www.grants.gov/web/grants/applicants/adobe-software-compatibility.html>.

- d. *Mandatory Fields in Forms*: In the forms, you will note fields marked with an asterisk and a different background color. These fields are mandatory fields that must be completed to successfully submit your application.
- e. *Complete SF-424 Fields First*: The forms are designed to fill in common required fields across other forms, such as the applicant's name, address, and UEI number. To trigger this feature, an applicant must complete the SF-424 information first. Once it is completed, the information will transfer to the other forms.

- f. *Submit a Workspace:* An application may be submitted through workspace by clicking the Sign and Submit button on the Manage Workspace page, under the Forms tab. Grants.gov recommends submitting your application package at least 24-48 hours prior to the close date to provide you with time to correct any potential technical issues that may disrupt the application submission.
- g. *Track a Workspace Submission:* After successfully submitting a workspace application, a Grants.gov Tracking Number (GRANTXXXXXXXX) is automatically assigned to the application. The number will be listed on the Confirmation page that is generated after submission. Using the tracking number, access the Track My Application page under the Applicants tab or the Details tab in the submitted workspace.

For additional training resources, including video tutorials, refer to:
<https://www.grants.gov/web/grants/applicants/applicant-training.html>.

Applicant Support: Grants.gov provides applicants 24/7 support via the toll-free number 1-800-518-4726 and email at support@grants.gov. For questions related to the specific grant opportunity, contact the number listed in the application package of the grant to which you are applying.

If you are experiencing difficulties with your submission, it is best to call the Grants.gov Support Center and get a ticket number. The Support Center ticket number will assist DHS with tracking your issue and understanding background information on the issue.

9. **Timely Receipt Requirements and Proof of Timely Submission**

Online Submission. All applications must be received by 11:59 PM Eastern time on the due date established for each program. Proof of timely submission is automatically recorded by Grants.gov. An electronic date/time stamp is generated within the system when the application is successfully received by Grants.gov. The applicant with the AOR role who submitted the application will receive an acknowledgement of receipt and a tracking number (GRANTXXXXXXXX) from Grants.gov with the successful transmission of their application. This applicant with the AOR role will also receive the official date/time stamp and Grants.gov Tracking number in an email serving as proof of their timely submission.

When DHS successfully retrieves the application from Grants.gov and acknowledges the download of submissions, Grants.gov will provide an electronic acknowledgment of receipt of the application to the email address of the applicant with the AOR role who submitted the application. Again, proof of timely submission shall be the official date and time when Grants.gov receives your application. Applications received by Grants.gov after the established due date for the program will be considered late and will not be considered for funding by DHS.

Applicants using slow internet, such as dial-up connections, should be aware that transmission can take some time before Grants.gov receives your application. Again, Grants.gov will provide either an error or a successfully received transmission in the form of an email sent to the applicant with the AOR role attempting to submit the application. The Grants.gov Support Center reports that some applicants end the transmission because they think that nothing is occurring during the transmission process. Please be patient and give the system time to process the application.

10. Content and Form of Application Submission

See Appendix A for a list of required documents for this application, forms, and formats. No pre-applications or letters of intent are required to apply.

As discussed in the eligibility section of this NOFO, current awardees and sub-awardees under the FY 2022 Citizenship and Integration Grant Program (funding opportunities DHS-22-CIS-010-002 and DHS-22-CIS-010-003) are not eligible to receive funding under this funding opportunity.

Subrecipients to DHS-22-CIS-010-02 (Citizenship Instruction and Naturalization Application Services Grant Program) or DHS-22-CIS-010-01 (Regional Hub Grants) are not eligible to receive funding under this funding opportunity.

11. Other Submission Requirements

DHS is participating in the Grants.gov initiative to provide the grant community with a single site to find and apply for grant funding opportunities. DHS requires applicants to submit their applications online through Grants.gov. Applications that are not submitted through Grants.gov by the deadline will not be considered.

12. Funding Restrictions

Grant funds may **not** be used for the following purposes:

- a. Cost-sharing or matching funds for other federal grants, lobbying, or intervention in federal regulatory or adjudicatory proceedings. In addition, federal funds may **not** be used to sue the federal government or any other government entity.
- b. USCIS application fees.
- c. Costs of organized fundraising, including financial campaigns, endowment drives, solicitation of gifts and bequests, and similar expenses incurred solely to raise capital or obtain contributions.
- d. Profit/Fee is not allowable except when subcontracting for routine goods and services with commercial organizations.
- e. Foreign travel.
- f. Construction costs and purchase of real property under this funding opportunity.
- g. Pre-award costs.
- h. Funding for direct reimbursement of proposal development.
- i. Costs for food or refreshments.
- j. Incentive items or gift cards.
- k. General volunteer stipends.

- l. Living allowances for any national volunteer service program participants.
- m. Fees for conferences that are not considered training events.

13. Allowable Costs

- a. DHS grant funds may only be used for the purposes set forth in the agreement and must be consistent with the statutory authority for the award. Grant funds may be used for the following purposes:
 - 1.) Providing services to qualified program participants only, regardless of race, color, religion, sex, or national origin.
 - 2.) Resources to support citizenship instruction, including staff salaries, textbooks/materials, nationally normed standardized assessment tests, software, etc.
 - 3.) Professional development and training for staff and/or volunteers related to the provision of citizenship instruction and/or naturalization application services.
 - 4.) Facility rental costs **not** to exceed more than 20% of the total approved budget.
 - 5.) Resources to support naturalization application services including staff salaries, case management systems, costs associated with DOJ recognition of organizations and accreditation (or renewal) of staff. This includes training costs related to DOJ recognition and accreditation.
 - 6.) Transportation costs for students attending grant-funded classes.
 - a. Transportation funds provided to students must match the student's individual transportation costs.
 - b. Applicants must have a system to track how transportation funds are used.
 - 7.) Reimbursement of transportation costs for volunteers participating in grant-funded activities. Volunteers may **not** receive a general transportation stipend.
 - a. Transportation funds provided to volunteers must match the volunteers' individual transportation costs.
 - b. Applicants must have a system to track how transportation funds are used.
 - 8.) Childcare costs to assist eligible participants to attend grant-funded classes.
 - 9.) Travel costs for two staff members to attend a mandatory two-day grant recipient training in the Washington, D.C. area during the first year of the grant, and costs for one teacher or coordinator to attend a USCIS teacher training (or another professional development training with approval from USCIS) during the second year of the grant.
 - 10.) Equipment purchases directly related to the provision of services.
 - 11.) Costs associated with the use of computers for citizenship instruction (e.g., computer equipment, internet access, electronic tablets, etc.).

b. Management and Administration (M&A) Costs

Management and Administration Costs are allowable for the grantee and any proposed sub-applicant (if applicable). For more information on allowable costs, please see Funding Restrictions (above).

c. Indirect Facilities and Administrative (F&A) Costs

Indirect Costs (IDC) are allowable by the recipient and subrecipients as described in 2 C.F.R. Part 200, including 2 C.F.R. § 200.414. Applicants with a current negotiated IDC rate agreement who desire to charge indirect costs to an award must provide a copy of their IDC rate agreement at the time of application. Not all applicants are required to have a current negotiated IDC rate agreement. Applicants that are not required to have a negotiated IDC rate agreement but are required to develop an indirect cost rate proposal must provide a copy of their proposal at the time of application. Applicants who do not have a current negotiated IDC rate agreement (including a provisional rate) and wish to charge the de minimis rate must reach out to the Program Office and the Grants Office for further instructions.

E. Application Review Information

1. Application Evaluation Criteria

a. Programmatic Criteria

DHS will use the following criteria to evaluate applications deemed eligible and responsive. Applicants can receive up to 100 points.

1.) Community Need (10 Points)

The extent to which the applicant articulates and describes:

- The population it currently serves with integration services. (4 points)
- Knowledge and understanding of the particular integration service needs of the population the applicant plans to service. (3 points)
- The extent to which integration needs are unmet within the community it plans to service and how the grantee will ensure the target population are made aware of the services to be provided under the grant. (3 points)

2) Integration Services (35 Points)

The extent to which the applicant articulates and describes:

- Recent (in the past three years) experience providing civic integration services, and ability to access a network of local service providers. (5 points)
- Detailed intake procedures to include verification and documentation of program participant eligibility for services. (9 points)
- A process for assessing participant's integration needs. (9 points)
- A detailed sample integration plan, to be used as a tool to develop plans for participants. Plans should cover a wide variety of integration needs. Sample tool should include a list of possible integration services. (7 points)
- How the applicant will track progress of individual integration plans for all program participants and for how long. (5 points)

3) Civics-based Literacy, Civics-based ESL, and Citizenship Instruction Program (25 Points)

The extent to which the applicant articulates and describes:

- Recent (in the past three years) and extensive (a minimum of one year) experience providing citizenship instruction to the target population. (5 points)
- Recent (in the past three years) and extensive (a minimum of one year) experience providing literacy or ESL instruction to the target population. (5 points)
- The experience and qualifications of the proposed instructor(s). (5 points)
- A description of the student assessment process, including information on which specific nationally-normed standardized test of English that will be used and the organization's recent experience with administering this test. Please identify the staff person who will be conducting the assessments and the training and certification they have received. (4 points)
- Instruction following a curriculum with the use of a published textbook in a classroom setting. (6 points)

4) Naturalization Application Services Program (25 Points)

The extent to which the applicant demonstrates:

- Recent experience providing naturalization application services within the authorized practice of immigration law.⁶ (8 points)
- High quality service delivery and case management. (8 points)
- Qualified and experienced personnel. (as described in the project narrative requirements) (9 points)

5) Cost and Program Effectiveness and Balance (5 Points)

The extent to which the applicant's:

- Proposed budget is tied to the delivery of high-quality integration services and demonstrates adequate funding for the hiring of qualified program staff. (2 points)
- Proposed budget satisfies the 10% cost share requirement. (2 points)
- The extent to which the application includes all required information and supporting documentation. (1 point)

⁶ DHS requires that all applicants demonstrate experience providing naturalization application services within the authorized practice of immigration law. Applications that fail to demonstrate this experience will be ineligible for award.

b. Financial Integrity Criteria

Prior to making a federal award, the DHS GFAD is required by 31 U.S.C. §3321 note, 41 U.S.C. §2313, and 2 C.F.R. §200.205 to review information available through any OMB-designated repositories of government wide eligibility qualification or financial integrity information. Therefore, application evaluation criteria may include the following risk-based considerations of the applicant:

- 1) Financial stability.
- 2) Quality of management systems and ability to meet management standards.
- 3) History of performance in managing federal award.
- 4) Reports and findings from audits.
- 5) Ability to effectively implement statutory, regulatory, or other requirements.

c. Supplemental Financial Integrity Criteria and Review

Prior to making a federal award where the anticipated total federal share will be greater than the simplified acquisition threshold, currently \$250,000 (see Section 805 of the National Defense Authorization Act for Fiscal Year 2018, Pub. L. No. 115-91, OMB Memorandum M-18-18 at <https://www.whitehouse.gov/wp-content/uploads/2018/06/M-18-18.pdf>):

- 1) DHS Grants and Financial Assistance Division is required to review and consider any information about the applicant that is in the designated integrity and performance system accessible through SAM, which is currently the [Federal Awardee Performance and Integrity Information System](#) (FAPIIS) and is accessible through the sam.gov website.
- 2) An applicant, at its option, may review information in FAPIIS and comment on any information about itself that a federal awarding agency previously entered.
- 3) DHS Grants and Financial Assistance Division will consider any comments by the applicant, in addition to the other information in FAPIIS, in making a judgment about the applicant's integrity, business ethics, and record of performance under federal awards when completing the review of risk posed by applicants as described in 2 C.F.R. §200.206.

2. Review and Selection Process

DHS will conduct an initial review of applications to determine the responsiveness of the application. If an applicant is determined to be ineligible (see section C. Eligibility Information) or an application is determined to be non-responsive, DHS will notify the applicant. All responsive and eligible applications will be reviewed as described below:

- a. DHS will assemble reviewers which may include both federal and non-federal reviewers to review the eligible applications. Reviews of submitted applications will be conducted either on site or by remote review.
- b. Teams of technical reviewers will review each eligible application against the evaluation criteria. The reviewers will assign a score and provide summary

comments based on the evaluation criteria identified above.

- c. An application may be selected for post-review quality control and possible rescoring if it received significantly diverging scores and comments from reviewers.
- d. An internal review panel consisting of DHS staff will review the highest ranked applications and make final funding recommendations. The internal review panel may take applications out of rank order in consideration of strategic program priorities, which are identified below.
- e. DHS may perform an additional review of the applicant organization and any subrecipients and/or its key personnel. This may include reviewing audit reports, publicly available materials, and/or government data which may have a bearing on award outcome. DHS may request additional materials from the applicant as part of this review, including:
 - 1) The summary letter from the applicant's most recent audit report;
 - 2) Documentation of previous grant award completion that includes the name of the grantor, amount awarded, and whether the grant recipient sufficiently completed the requirements of the grant award (e.g., a final close-out report, certification of grant award completion, etc.);
 - 3) A pre-award site visit or investigation to determine and validate current services and proposed activities; and
 - 4) A site visit conducted in the case of a contingent award in order to evaluate the organization's ability to satisfy the programmatic and administrative requirements of the grant. DHS reserves the right to not pursue the completion of the award process if preliminary investigations and/or site visits do not provide sufficient evidence of organizational capacity to successfully administer the proposed grant.
- f. After the technical review and before making final funding decisions, DHS may contact the highest-ranking applicants to seek clarification and to negotiate technical and programmatic aspects of the application. This will include negotiations on the curriculum content, staffing, budget, and proposed activities. If an application includes a proposed subrecipient that will provide additional or complementary direct grant-funded services in partnership with the main applicant, DHS may request to speak with all parties included in the application to ensure sufficient planning and coordination has taken place prior to making an award.
- g. Confidentiality and Conflict of Interest. Technical and cost proposals submitted under this NOFO will be protected from unauthorized disclosure in accordance with applicable laws and regulations. DHS may use one or more support contractors in the logistical processing of proposals; however, funding recommendations and final award decisions are solely the responsibility of DHS

personnel.

DHS screens all technical reviewers for potential conflicts of interest. To determine possible conflicts of interest, DHS requires potential reviewers to complete and sign conflict of interest and nondisclosure forms. DHS will keep the names of submitting institutions and individuals as well as the substance of the applications confidential except to reviewers and DHS staff involved in the award process. DHS will destroy any unsuccessful applications after 3 years following the funding decision.

- h. DHS strongly discourages, and will not consider, any supplementary materials submitted by or on behalf of the applicant (e.g., letters of support) other than those materials specifically requested in this NOFO.
- i. DHS will notify all applicants electronically of funding decisions. Unfunded applicants may send a written request to citizenshipgrantprogram@uscis.dhs.gov to receive a written summary of comments related to the evaluation criteria, along with the points awarded to the application for each of the evaluation criteria. DHS will send the written summary to the applicant within 120 days of receipt of the request. Additional information beyond that described here will not be provided.
- j. **Strategic Program Priorities:** Based on the recommendations of the internal review panel, DHS may consider the following factors when making an award:

1.) Program Balance Factors, including (in descending order of importance):

- a) Whether an application shows prioritization for marginalized, vulnerable, or underserved populations (e.g., populations that have historically not received USCIS funding);
- b) Whether an application, when balanced with other potential awards and with existing Citizenship and Integration Grant Program recipients, represents a diverse geographic area; and
- c) Whether an application, when balanced with other potential awards and existing Citizenship and Integration Grant Program recipients, represents a diverse population.

2) Past performance of a previous Citizenship and Integration Grant Program recipient (if applicable), including:

- a) Whether a previous grant recipient achieved their core program goals;
- b) Whether a previous grant recipient had major findings during a monitoring visit and failed to resolve them in the

- prescribed time period;
- c) Whether a previous grant recipient was placed on restricted drawdown status for cause, and if so, whether they were able to meet the conditions to have this restriction removed; and
- d) Whether a previous grant recipient demonstrated an ability to file accurate and timely quarterly performance reports.

F. Federal Award Administration Information

1. Notice of Award

Notice of award will be sent by DHS to the awardee's Authorized Organization Representative (AOR). Before accepting the award, the AOR and recipient should carefully read the award package. The award package includes instructions on administering the grant award and the terms and conditions associated with responsibilities under federal awards. By submitting an application, applicants agree to comply with the requirements of this NOFO and the terms and conditions of the award, should they receive an award.

A grant award will be executed by a DHS Grants Officer authorized to obligate DHS funding. Organizations that are being funded for the first time under this grant program will be placed on restricted drawdown until quarterly performance goals are met. Unsuccessful applicants will be contacted as well and will be encouraged to apply for future grant award programs. Announcements for future grant opportunities will be listed on [Grants.gov](https://www.dhs.gov/grants).

2. Administrative and National Policy Requirements

All successful applicants for DHS grants are required to comply with DHS Standard Terms and Conditions, which are available online at: [DHS Standard Terms and Conditions](#). In addition, awardees are required to comply with the prohibitions on certain telecommunications equipment and services under Section 889 of the [John. S. McCain National Defense Authorization Act](#) (NDAA) for Fiscal Year (FY) 2019.

Post-award program income: In the event program income becomes available to the recipient post-award, it is the recipient's responsibility to notify the DHS Grants Officer to explain how that development occurred, as part of their request for guidance and/or approval. The Grants Officer will review approval requests for program income on a case-by-case basis; approval is not automatic. Consistent with the policy and processes outlined in 2 C.F.R. Part 200, pertinent guidance and options, as determined by the type of recipient and circumstances involved, may be approved by the Grants Officer. If approval is granted, an award modification will be issued with an explanatory note in the remarks section of the face page concerning guidance and/or options pertaining to the recipient's approved request. All instances of program income must be listed in the progress and financial reports.

The applicable DHS Standard Terms and Conditions will be those in effect at the time the award was made unless the application is for a continuation award. In that event, the terms and conditions in effect at the time the original award was made will generally apply. What terms and conditions will apply for the award will be clearly stated in the award package at the time of award.

3. Reporting

a. Federal Financial Reporting Requirements

The recipient must submit a Form SF-425, Federal Financial Report (FFR), to the DHS Grants Officer no later than 30 days after the end of the reporting period end date. The FFR is available online at <https://www.grants.gov/web/grants/forms/post-award-reporting-forms.html>. The FFR shall be submitted via GrantSolutions using the guidance found here: www.grantsolutions.gov/support/public/pdf/FederalFinancialReport-RecipientsFinalv2.pdf.

The Federal Financial Report (FFR) form is available online at: [SF-425 OMB #4040-0014](https://www.omb.eop.govt/sf-425)

b. Programmatic Performance Reporting Requirements

The recipient is required to submit quarterly performance reports to the USCIS Program Office and the DHS Grants Officer within 30 days after the end of each quarter. Reports are due January 30, April 30, July 30, and October 30. Reports must be submitted via the USCIS Grantbook platform and GrantSolutions.gov.

Grant recipients must collect and report data on each immigrant served with grant funding, which may include:

- 1) Alien registration numbers. USCIS may use these numbers to track naturalization outcomes during and after the period of performance;
- 2) Class of admission for program participants;
- 3) Countries of birth;
- 4) When specific services were provided, including:
 - Dates integration plans were developed;
 - List of each referral and outcomes
 - Dates participants were enrolled in citizenship instruction courses;
 - Dates when classes are held;
 - Dates pre- and post-tests were conducted, and scores achieved;
 - Classes attended, including the number of hours in class;
 - Dates naturalization eligibility screenings were conducted; and
 - Dates Forms N-400 and G-28 were filed.
- 5.) Number of integration plans developed;

- 6.) Class proficiency levels;
- 7.) Names of instructors(s) teaching each class;
- 8.) Number of instructional hours provided per class;
- 9.) Instructional hours of each participant enrolled (attendance hours) Number of students enrolled per class; and
- 10.) Number of N-400s filed by the grant organization to USCIS.

In addition to collecting these data, grant recipients must also provide quarterly narrative reports. The narrative report may include questions on the following topics: program accomplishments, progress meeting goals, progress of the subrecipient organization (if applicable), challenges in meeting goals, staff and/or organizational development activities, student assessment and progress, outreach activities, volunteer recruitment and training, staff changes, progress made toward DOJ accreditation, and promising practices.

These data are used to measure and track grantee performance and assess the success of individual programs as well as the collective performance of all grantees. All grantee performance data can be used to determine continued and future USCIS grant funding.

c. Closeout Reporting Requirements

Within 120 days after the end of the period of performance, or after an amendment has been issued to close out a grant, recipients must submit the following:

- 1) The final request for payment, if applicable;
- 2) The final FFR (SF-425);
- 3) The final progress report detailing all accomplishments;
- 4) A qualitative narrative summary of the impact of those accomplishments throughout the period of performance; and
- 5) Other documents required by this NOFO, terms and conditions of the award, or other GFAD guidance.

After these reports have been reviewed and approved by GFAD, a closeout notice will be completed to close out the grant. The notice will indicate the period of performance as closed, list any remaining funds that will be de-obligated, and address the requirement of maintaining the grant records for three years from the date of the final FFR, unless a longer period applies, such as due to an audit or litigation, for equipment or real property used beyond the period of performance, or due to other circumstances outlined in 2 C.F.R. §200.334, Retention Requirements for Records.

In addition, any recipient that issues subawards to any subrecipient is responsible for closing out those subawards as described in 2 C.F.R. §200.344, Closeout. Recipients acting as pass-through entities must ensure that they complete the closeout of their

subawards in time to submit all necessary documentation and information to GFAD during the closeout of their prime grant award.

The recipient is responsible for returning any funds that have been drawn down but remain as unliquidated on recipient financial records.

d. Disclosing Information per 2 C.F.R. §180.335

This reporting requirement pertains to disclosing information related to government-wide suspension and debarment requirements. Before a recipient enters into a grant award with GFAD, the recipient must notify GFAD if it knows if it or any of the recipient's principals under the award fall under one or more of the four criteria listed at 2 C.F.R. § 180.335:

- 1) Are presently excluded or disqualified;
- 2) Have been convicted within the preceding three years of any of the offenses listed in 2 C.F.R. § 180.800(a) or had a civil judgment rendered against it or any of the recipient's principals for one of those offenses within that time period;
- 3) Are presently indicted for or otherwise criminally or civilly charged by a governmental entity (federal, state, or local) with commission of any of the offenses listed in 2 C.F.R. § 180.800(a); or
- 4) Have had one or more public transactions (federal, state, or local) terminated within the preceding three years for cause or default.

At any time after accepting the award, if the recipient learns that it or any of its principals falls under one or more of the criteria listed at 2 C.F.R. § 180.335, the recipient must provide immediate written notice to GFAD in accordance with 2 C.F.R. § 180.350.

e. Reporting of Matters Related to Recipient Integrity and Performance

Per 2 C.F.R. Part 200, Appendix I § F.3, the additional post-award reporting requirements in 2 C.F.R. Part 200, Appendix XII may apply to applicants who, if upon becoming recipients, have a total value of currently active grants, cooperative agreements, and procurement contracts from all federal awarding agencies that exceeds \$10,000,000 for any period of time during the period of performance of an award under this funding opportunity. Recipients that meet these criteria must maintain current information reported in FAPIIS about civil, criminal, or administrative proceedings described in paragraph 2 of Appendix XII at the reporting frequency described in paragraph 4 of Appendix XII.

f. Monitoring and Oversight

Per 2 C.F.R. §200.329, GFAD through its authorized representatives, has the right, at all reasonable times, to conduct desk reviews, make site visits to review project accomplishments and management control systems to review project accomplishments and to provide any required technical assistance. During site visits

or desk reviews, GFAD will review grant recipients' files related to the grant award. As part of any monitoring and program evaluation activities, grant recipients must permit GFAD upon reasonable notice, to review grant-related records and to interview the organization's staff and contractors regarding the program. Recipients must respond in a timely and accurate manner to GFAD requests for information relating to the grant program.

If the monitoring visit results in a determination that basic, minimum requirements as outlined in the Notice of Funding Opportunity are not being met, DHS may require corrective actions and/or initiate termination of the award.

g. Program Evaluation

Recipients and subrecipients are encouraged to incorporate program evaluation activities from the outset of their program design and implementation to meaningfully document and measure their progress towards the outcomes proposed. Title I of the Foundations for Evidence-Based Policymaking Act of 2018 ([Evidence Act](#)), [Pub. L. No. 115-435 \(2019\)](#) defines evaluation as "an assessment using systematic data collection and analysis of one or more programs, policies, and organizations intended to assess their effectiveness and efficiency." Evidence Act § 101 (codified at 5 U.S.C. § 311). Credible program evaluation activities are implemented with relevance and utility, rigor, independence and objectivity, transparency, and ethics (OMB Circular A-11, Part 6 Section 290).

Evaluation costs are allowable costs (either as direct or indirect), unless prohibited by statute or regulation, and such costs may include the personnel and equipment needed for data infrastructure and expertise in data analysis, performance, and evaluation. (2 C.F.R. §200).

In addition, recipients are required to participate in a DHS-led evaluation if selected, which may be carried out by a third-party on behalf of the Program Office or DHS. By accepting grant funds, recipients agree to participate in the evaluation, which may include analysis of individuals who benefit from the grant, and provide access to program operating personnel and participants, as specified by the evaluator(s) for six months after the period of performance.

G. DHS Awarding Agency Contact Information

1. Contact and Resource Information

USCIS Program Office (Office of Citizenship):

- Send all questions to citizenshipgrantprogram@uscis.dhs.gov.
- USCIS Office of Citizenship staff will respond within five business days.

DHS Grants Office: Send all questions to the Grants Officer at CISMailbox@hq.dhs.gov

H. Other Information

Applicants will obtain NOFO overviews and full announcement information from the Grants.gov website where the full NOFO is posted. Applications will be processed through the Grants.gov portal.

1. Period of Performance Extensions

Grantees may request a no-cost extension in order to complete all project activities. The request must be submitted 45 days prior to the expiration of the performance period. Grantee requests for extension will be evaluated based on performance to date and potential for meeting programmatic requirements within the proposed extension period. Requests for extensions are subject to approval by the DHS Grants and Financial Assistance Grants Officer.

1. Appendices

For information on additional required documents, and the format of the narrative application please see Appendix A. For definitions of frequently used terms in this NOFO, see the FY 2023 Glossary in Appendix C. For a full list of acceptable classes of admission under this NOFO, please see Appendix D.

APPENDIX A: ADDITIONAL REQUIRED FORMS

Complete the required forms in accordance with the application instructions on Grants.gov. If submitting any information that is deemed proprietary, privileged, confidential, commercial or financial, please denote the beginning and ending of such information with asterisks (***)

1. Form SF-424 – Application for Federal Assistance

This form must be completed within the application package on Grants.gov. You must download and install Adobe Reader to view this form. Applicants are only required to complete fields which are highlighted.

2. Form SF-424A – Budget

This form must be completed within the application package on Grants.gov. You must download and install Adobe Reader to view this form. Applicants are only required to complete fields which are highlighted. Provide budget amounts by object class (personnel, fringe benefits, travel, etc.). Include second year budget amounts in Section E. Funds may be requested if the item and amount are necessary to perform the proposed work and are not precluded by the cost principles or program funding restrictions.

3. Certifications/Assurances

These forms must be completed within the application package on Grants.gov. You must download and install Adobe Reader to view these forms. Applicants must submit:

- a. Form SF-424B – Assurances – Non-Construction Programs; and
- b. Certification Regarding Lobbying. If paragraph two of the certification applies, then complete and submit SF-LLL Disclosure of Lobbying which is provided as an optional form in the application package.

By signing and submitting an application under this announcement, the applicant is providing Certification Regarding Drug-Free Workplace Requirements; Certification Regarding Debarment, Suspension, and Other Responsibility Matters – Primary Covered Transactions; and Certification that the applicant is not delinquent on any federal debt.

4. Project Abstract (5 pages maximum)

Provide the information requested below. Please address each question in the order outlined in the table below. The project abstract must not include any proprietary or confidential information. Attach the Project Abstract to the application package.⁷

⁷ See the Grants.gov [Applicant User Guide](#) for instructions on how to attach forms and documents.

General Information <i>Complete the following table.</i>		
1.	Organization legal name	
2.	Organization legal address (Number and street, city, state, zip code)	
3.	Head of the organization (Name, title, address, phone number, email address)	
4.	Authorized Organization Representative (AOR), the person at the organization authorized to sign and receive award (Name, title, address, phone number, email address and website)	
5.	Grant Project Manager, the person who will manage operations of the grant project and will serve as USCIS' primary point of contact (Name, title, address, phone number, email address)	
6.	Type of organization (e.g., community/faith-based organization, public school, adult education program, public library)	
7.	Total numbers organization is proposing to serve with this grant agreement: <ul style="list-style-type: none"> • Integration plans developed; • Students enrolled; • Form N-400 screenings; • Form N-400's filed 	
8.	Annual Organizational Budget	
9.	Total federal funding requested (up to \$300,000)	
10.	Total federal funding allocated for citizenship instructor salaries	
11.	Total federal funding allocated for administrative costs	
12.	Total cost share (percentage of total award amount requested; minimum of 10% required)	
13.	Geographic area/community where services will be provided	
14.	Congressional district (based on the legal address of the applicant organization)	

15.	Number of full-time equivalents (FTEs). Indicate the number of intended grant-funded FTEs.	
16.	Is your organization or proposed subrecipient DOJ recognized? (yes/no)	
17.	List all employees who are DOJ Accredited or attorneys who will work on this grant	
18.	List any grants received by the applicant in the past three years focused on adult education or services to immigrants. Include: <ul style="list-style-type: none"> • Awarding agency • Date received • Dollar amount 	
Proposed Subrecipient Organization(s) (if applicable) <i>If there are multiple subrecipients, provide the below information for each.</i>		
19.	Subrecipient organization legal name	
20.	Subrecipient organization point of contact (Name, title, address, phone number and email address)	
21.	Is the subrecipient a non-profit or public organization? If not, the subrecipient is not eligible to receive funding	
22.	Subrecipient type of organization (e.g., community/faith-based organization, public school, adult education program, public library, etc.)	
23.	Services proposed by subrecipient organization (integration services, legal services, and/or education services)	
24.	Total federal funds allocated for the subrecipient	

5. Project Narrative (16 double-spaced page maximum)

In a separate document, provide a response for each item in the chart below following the order listed. **The items and attachments listed in each section below are required.** Any item or attachment that is omitted will result in points deducted.

Format Requirements

- Include the title “Project Narrative” at the top of the first page.
- Ensure that the application can be printed on 8 ½” x 11” single-sided paper.
- Use double line spacing.
- Font size must be at least 12 point, Times New Roman font.
- Margins must be at least one inch at the top, bottom, left and right of the paper.
- Project narrative pages must be numbered “1” of “XX.”
- Pages should be numbered consecutively and are limited to a total of **16 pages**.
- Do not include any marks from the “Track Changes” tool in your word processing program.
- Attach the completed Project Narrative to the application package.

Project Narrative Items
Integration Services
1. Community Need
<ul style="list-style-type: none"> • The particular population(s) that you currently serve with integration services, (e.g., the number of refugees resettled in the local area during the past five years under United States Refugee Admissions Program); estimated number of secondary refugee migrants to the area; countries of origin; year(s) of arrival; languages spoken; and typical literacy/education needs. • The current unmet need for integration services among the population that you serve, including whether there are wait lists for integration services at your organization or others. Indicate how many individuals you will provide with integration support under this grant and whether there are other service providers in your area. • The current need for civics-based literacy instruction, civics-based ESL, and citizenship instruction among the population that you serve, including whether there are wait lists for citizenship instruction and/or ESL instruction at your organization or others. Indicate whether there are other citizenship and ESL instruction service providers in your area. • The current need for naturalization application services among the population that you serve, including whether there are wait lists for services. Indicate whether there are other naturalization application service providers in your area.
2. Integration Plan Development and Monitoring
<ul style="list-style-type: none"> • Intake procedures, including how the organization and subrecipient (if applicable) will verify and document that only program participants will receive services funded through this funding opportunity, and who will conduct the intake. • The process you will use to assess program participants and to create an individual integration plan for those who have identified naturalization as a goal. List the key information you will collect and use to inform the development of individual integration plans for each participant, including information on English language proficiency and

naturalization eligibility. **Attach an integration sample.** (Note that this does not count towards the application page limit.)

- **Who on your staff will directly work with the program participants to develop the integration plans** and monitor their implementation (attach resumes or position descriptions).
- **How your organization will use the individual integration plan to guide referrals to integration services** available under this grant, and to services provided by partner organizations; provision of civics-based literacy, civics-based ESL, or citizenship instruction; and provision of naturalization application services. Describe how you will use the integration plan to monitor and track the client's progress toward integration goals.
- **The number of individual integration plans you will develop with participants under this program.** You must propose to serve the minimum number of program participants, as outlined in the chart on page four of this NOFO. You must prepare an integration plan for each program participant served.

3. Integration Services

- **The types of integration services you intend to directly provide using grant funding,** the number of participants you will serve with each type of service.
- **Additional integration services** to which you will provide referrals, as appropriate.
 - Your organization's and, if applicable, subrecipient's recent experience (in the past five years) providing integration services to program participants. Describe in detail the specific types of services provided and indicate dates, total years of experience, the number of participants served with each type of service in the past year and any previous years. Your organization's ability to refer enrolled participants to a network of local service providers with whom you have an established and ongoing relationship to provide an array of integration support that will not be provided directly by the applicant.

Citizenship Instruction Program

1. Experience and Community Need

- The citizenship instruction provider's recent experience providing literacy and/or ESL instruction. The description must distinguish if it is the applicant or subrecipient experience. Include:
 - Dates and total years of experience providing literacy and/or ESL instruction using a curriculum;
 - The number of students enrolled in literacy or ESL classes in the past year and any previous years;
 - Name of the standardized test of English language proficiency used (such as CASAS, BEST Plus 2.0, TABE CLAS-E etc.);
 - Experience administering the standardized test(s); and
 - The program's pre- and post-test rates for the last program cycle, if applicable, as well as the percentage of students that demonstrated educational gains in that same program cycle.
- The citizenship instruction provider's (must distinguish if it is the applicant or sub-applicant) recent experience providing citizenship instruction. Include the following:
 - Dates and total years of experience providing citizenship instruction using a curriculum;
 - The number of students enrolled in citizenship instruction in the past year and any previous years;
 - If available, the naturalization test pass rate for program participants; and
 - The textbook and other resources used.
- The particular immigrants that you currently serve with literacy, ESL, or citizenship instruction.
- The need for citizenship instruction among the immigrant population that you serve, including whether there are wait lists for citizenship instruction and/or ESL instruction at your organization. Indicate whether there are other citizenship and ESL instruction service providers in your area.

2. Proposed Goals for Enrollment, Testing, and Educational Gains

- Explain how the proposed number of students to be served under the grant-funded program is attainable based on your organization's experience, past performance, and the proposed budget.
- Explain how the proposed goals for 1) the percentage of students to be pre- and post-tested and 2) the percentage of students demonstrating educational gains are feasible based on your organization's experience, past performance, and proposed budget.
- Describe the retention strategies employed or that will be employed to maintain a satisfactory post-test rate. Describe the strategies employed or that will be employed to assist students who are not making educational gains.
- Indicate how many additional students will be served under the grant-funded program that would otherwise not be served.

3. Program Administration

- The outreach plan to raise awareness of program services, and recruit students.
- The intake procedures, including how the organization will verify and document that only lawfully present immigrants will receive services funded through this funding opportunity.
- The orientation process for new students.
- The strategies you use to address barriers to student attendance (e.g., transportation, childcare, student tuition, etc.), and include your organization's attendance policy.
- The proposed managed enrollment policy for the program, including whether students will be permitted to enroll in grant-funded classes after the start of a class cycle (and if so, the enrollment cut-off period). Include how the organization will accommodate students who desire to attend classes after the registration period has closed. Note: Programs may not enroll students after the third class.

4. Class and Management Structure

- A description of the specific nationally normed standardized test or test(s) that will be used for the program to assess English language proficiency.⁸ Please also describe when the tests will be administered, and who will conduct the tests.
- Include a table, similar to the sample below, with information from the classes you are proposing for this grant.

Name of Class	Location	Days, Times	Length/Total Instructional Hours	Textbook	Instructor's Name
High Beginning	Main campus Building A	Mondays and Wednesdays, 6:00-8:00	10 weeks each quarter/40 hours	Citizenship Tomorrow-Acme Publishing 2019 27 th edition	Jill Brown

- Provide a separate document as an attachment to the proposal summarizing your proposed grant-funded citizenship program.⁹ This document will not count towards the project narrative page limit and must include:
 - A course outline or syllabus. Do not attach copies of books or USCIS materials;
 - Course learning objectives (for each course); and
 - Textbook(s) and supplemental materials to be used.

⁸ The standardized tests that the Department of Education has determined to be suitable to assess English language proficiency as listed in [Federal Register Notice Tests Determined To Be Suitable for Use in the National Reporting System](#)

⁹ For guidance on developing a citizenship curriculum, please review the [USCIS Guide to Creating an Adult Citizenship Education Curriculum](#).

5. Personnel

- Using the below sample staff table as a template, please provide information on your proposed citizenship instruction program staff. Please also provide resumes for each staff member included in the chart.

Sample Staff Table				
Name	Title and Position Description	Paid or Volunteer	FTE Charged to Grant	Relevant experience, qualifications, and training
Jill Brown	Education Program Coordinator – manages adult education programs	Paid	0.5 FTE	TESOL degree, 5 years of experience as a program manager, 10 years of experience teaching ESL

- If applicable, explain how **volunteers** will be used for the citizenship instruction program. Describe their roles and responsibilities, the training they will receive, and the reporting structure. Volunteers must be managed by a paid lead instructor or a paid education program coordinator.
- If your organization has only one instructor on staff at the time of application, please describe your organization's **contingency plan** for the provision of citizenship instruction in the event of staff turnover. Any changes to key personnel must be pre-approved by the program officer. See Appendix C for more information.

Naturalization Application Services Program

1. Experience and Community Need

- The naturalization application services provider's **recent experience providing naturalization application services within the authorized practice of immigration law**. Include:
 - Dates and total years of experience;
 - Whether the services were provided by attorneys or by DOJ accredited representatives; and
 - The number of immigrants served in the past year and any previous years.
- Program achievements**, including the organization's record of submitting successful naturalization applications.
- The **immigrant population(s) that you serve** with naturalization application services.
- The **need for naturalization application services** among the immigrant population that you serve, including whether there are wait lists for services. Indicate whether there are other naturalization application service providers in your area.

2. Attainable Naturalization Application Services Goals

- Explain how the proposed number of naturalization clients to be served under the grant-funded program is feasible based on your organization's experience, past performance, and the proposed budget.
- Indicate how many naturalization applications you anticipate filing in the next two years with this grant funding that otherwise would not have been filed. Please reference your program goals table attachment.

3. Program Administration

- The coordinated **outreach plan** to raise awareness of services and recruit clients.
- **The intake procedures**, including how the applicant and subrecipient (if applicable) will verify and document that only lawfully present immigrants will receive services funded through this funding opportunity, and who will conduct intake.

4. Service Delivery and Case Management

- The naturalization application services provided, including the forms filed on behalf of clients.
- The naturalization eligibility screening process and who will determine clients' eligibility for naturalization.
- The handling of complex cases.
- The support provided to participants throughout the application process (from intake until the oath ceremony).
- Participant preparation for the naturalization interview.
- How your organization keeps participants informed of their case status.
- Other delivery, such as group application workshops, and if so, the process for following up with those clients about their cases.
- How individual integration plans will be tracked.

5. Personnel

- The **staffing structure** for the proposed naturalization application services program.
 1. Provide a list of key personnel for the program. Key personnel include the project manager(s), the DOJ accredited representative(s) and/or attorney(s), and any additional case workers. Please also provide resumes for each listed staff member.
 2. For each person, provide the following information, preferably in a table format:
 - a. Name, or indicate if the position is vacant. If the position is vacant, provide a separate position description and target start date;
 - b. Title and brief position description;
 - c. Whether the position is paid or volunteer;

- d. FTE charged to the grant;
- e. Relevant experience, qualifications, and training. For the DOJ accredited representative(s) and/or attorney(s), indicate the level of experience providing naturalization application services;
- f. Indicate who will sign Form N-400 as the preparer and who will sign the FormG-28 in connection with all naturalization applications filed under this grant agreement; and
- g. Any changes to key personnel must be pre-approved by the program officer. See Appendix C for more information.

See below for a sample staff table.

Sample Staff Table				
Name	Title and Position Description	Paid or Volunteer	FTE charged to grant	Relevant experience, qualifications, and training
Jim Smith	DOJ accredited representative – provides immigration legal services to clients	Paid	0.3 FTE	Accredited for 5 years, 3 years of experience with naturalization application services

- If your organization has only one staff member that is DOJ accredited or an attorney, please describe your organization’s **contingency plan** for the provision of naturalization application services in the event of staff turnover. You may use grant funds to cover costs associated with the DOJ accreditation of additional staff members.
- If applicable, explain **how volunteers will be used** for the naturalization application services program. Describe their qualifications, roles and responsibilities, the training they will receive, and the reporting structure.

6. Project Narrative Attachments

NOTE: The attachments will not count toward the page limit for the Project Narrative. These items should be attached to the application package.

- a. Attach **résumés** and/or **position descriptions** (if the position is vacant) for all key personnel, including program managers and coordinators, instructors (paid and volunteer), attorneys and/or DOJ accredited representatives, and other legal support staff. Résumés must include all relevant job experience, education, and licensure or accreditation with corresponding dates.
- b. **Organizational chart** for the applicant and any proposed subrecipient(s).

- c. If you propose a subrecipient, the applicant must include a signed **Memorandum of Understanding (MOU)** between the organizations as a required attachment to the grant application. The MOU should include the responsibilities expected of each party, performance expectations, plans for maintaining communication, and the payment and/or reimbursement process for the subrecipient(s). The MOU should be signed by both parties and dated.

7. Program Goals

Provide the following goals for grant-funded services in a table format. Include the total number over the 2-year period, as well as a breakdown by quarter. There are 8 quarters over the 2-year performance period and each quarter is three months long.

Goal	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Total
1. Number of integration plans developed*									
2. Number of newly enrolled (non-duplicated) immigrants to enroll in citizenship instruction classes*									
3. Percentage of enrolled students who post-test (Minimum 80%)									
4. Percentage of post-tested students demonstrating measurable educational gains (Minimum 80%)									
5. Number of immigrants for whom your organization will provide naturalization eligibility screenings*									
6. Number of immigrants for whom your organization will prepare and file Form N-400 and Form G-28*									

* Goals for items 1, 2, 5 and 6 will depend on proposed funding level, as outlined in performance measure chart on page four.

8. Budget Table and Narrative

When proposing costs for this grant program, ensure that the budget shows a reasonable balance of costs between the citizenship instruction program and the naturalization application services program.

If a subrecipient is proposed, applicants must provide a separate subrecipient budget narrative and table following the same format and with the same level of detail as that of the applicant (that is, by Object Class Category/Cost Classification). Each subrecipient budget and supporting

detail should be separate from the applicant's budget narrative.

If any fees are proposed that will result in program income, show in the budget how this income will be used to support the program.

Budget Table

Provide your budget request in a table format in addition to the budget narrative. Include all budget categories, as listed in the budget narrative section. Under each category list the line items requested. See sample table below. Note: This sample table shows the Personnel category only. Applicants must provide information on all budget categories.

	Year 1			Year 2			Total		
Category and Item	In-Kind	DHS	Total	In-kind	DHS	Total	In-kind	DHS	Total
1. Personnel									
J. Smith, Program Manager – 1 FTE	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X
B. Diaz, Instructor – 0.5 FTE	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X
L. Santiago, Attorney – 1 FTE	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X
K. Brown, Assistant – 0.25 FTE	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X
TOTAL Personnel	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X

The Budget Table may be provided either in the same document as the budget narrative or attached to the application package.

Budget Narrative (Five-page limit)

Attach your budget narrative (including separate budget narratives for each proposed subrecipient) to the application package. Please limit the information provided in this section to budget relevant information only.

Include costs for the first and second performance years. Separate the first performance year costs from the second performance year costs. Show a total of all requested federal grant funds. This total should match the total listed on the project abstract. Budget categories **b – h** below should add up to this total. This total should **not** include any in-kind costs. The in-kind contribution total should be listed separately.

Provide budget information in the order listed below. Budget detail is required for:

- a. **In-Kind Costs:** The dollar value of non-cash donations to the project. These donations may be in the form of space, supplies, salaries, etc. The costs should be calculated at the verifiable fair-market value.
- b. **Personnel:** Costs of employee salaries and wages. For each staff person, provide the name (if known), title, time commitment to the project as a percentage of a full-time equivalent (FTE), annual salary, and grant-funded salary. Do not include the costs of consultants. Consultants are to be included under “Contractual.”
- c. **Fringe Benefits:** Costs of employee fringe benefits unless treated as part of an approved indirect cost rate. Provide the method used to calculate the proposed rate amount. If a fringe benefit has been negotiated with, or approved by, a cognizant federal agency, **attach a copy of the negotiated fringe benefit agreement.** If no rate agreement exists, provide a breakdown of the amounts and percentages that comprise fringe benefit costs such as health insurance, FICA, retirement insurance, taxes, etc. Identify the base for allocating these fringe benefit expenses. (Attach the agreement to the application package.)
- d. **Travel:** Costs of project-related travel by employees of the applicant organization and/or subrecipients (do not include costs of sub-contractor or consultant travel). For each proposed trip, provide the purpose, number of travelers, travel origin and destination, number of days, and a breakdown of costs for airfare, lodging, meals, car rental, and incidentals. The basis for the airfare, lodging, meals, car rental, and incidentals must be provided, such as past trips, current quotations, Federal Travel Regulations, etc. Foreign travel is not permitted. The applicant must include costs for two staff members to attend a **mandatory** two-day grant recipient orientation training in Washington, D.C. the first year of the grant, and costs for a teacher/coordinator to attend a USCIS teacher training on activities and methods that promote linguistic and civic assimilation during the second year of the grant.
- e. **Equipment:** Any article of nonexpendable, tangible personal property having a useful life of more than one year and an acquisition cost which equals or exceeds the lesser of (a) the capitalization level established by the organization for financial statement purposes, or (b) \$5,000. For each type of equipment requested, provide a description of the equipment, the cost per unit, the number of units, the total cost, and a plan for use on the project, as well as use or disposal of the equipment after the project ends. An applicant organization that uses its own definition for equipment should provide a copy of its policy or section of its policy which includes the equipment definition.

NOTE 1: Acquisition cost means the net invoice unit price of an item of equipment, including the cost of any modifications, attachments, accessories, calibration and maintenance services, or auxiliary apparatus necessary to make it usable for the purpose for which it is acquired. Ancillary charges, such as taxes, duty, protective in-transit insurance, freight, and installation must be included in or excluded from acquisition cost in accordance with the organization's regular written accounting practices.

NOTE 2: Before purchasing equipment in the amount of \$5,000 or more per unit cost, the Recipient must obtain the written approval from DHS. For equipment purchased with grant

funds (or received under a grant) and having a \$5,000 or more per unit cost, the Recipient must maintain an annual inventory, which will include a brief description of the item, serial number, and amount of purchase. The inventory must also identify the sub-award under which the equipment was purchased. Maintenance and insurance will be the responsibility of the Recipient. Title of equipment will remain with the Recipient until closeout when disposition will be provided in writing by DHS within 120 days of submission of final reports.

- f. **Supplies**: Costs of all tangible personal property other than that included in the equipment category. Specify general categories of supplies and their costs. Show computations and provide other information which supports the amount requested. Applicants should calculate the cost of assessments as well as printing the USCIS required assessment.
- g. **Contractual**: Costs of all contracts for services and goods except for those that belong under other categories such as equipment, supplies, construction, etc. Include third party evaluation contracts (if applicable) and contracts with secondary recipient organizations.

Demonstrate that all procurement transactions will be conducted in a manner to provide, to the maximum extent practical, open and free competition. Identify proposed sub-contractor work and the cost of each sub-contractor. Provide a detailed budget for each sub-contractor that is expected to perform work estimated to be \$25,000 or more, or 50% of the total work effort, whichever is less.

- Identify each planned subcontractor and its total proposed budget. Each subcontractor's budget and supporting detail should be included as part of the applicant's budget narrative.
- Provide the following information for each planned subcontract: a brief description of the work to be subcontracted; the number of quotes solicited and received, if applicable; the cost or price analysis performed by the applicant; names and addresses of the subcontractors tentatively selected and the basis for their selection; e.g., unique capabilities (for sole source subcontracts), low bidder, delivery schedule, technical competence; type of contract and estimated cost and fee or profit; and, affiliation with the applicant, if any.
- Recipient may be required to make pre-award review and procurement documents available to DHS, including request for proposals or invitations for bids, independent cost estimates, etc. This may include procurements expected to exceed the simplified acquisition threshold fixed at 41 U.S.C. § 403(11) (currently set at \$100,000) and expected to be awarded without competition or only one bid or offer is received in response to a solicitation.
- All required flow down provisions in the award must be included in any subcontract.

NOTE: Applicants may propose a sub-contract for specific tasks, such as hiring additional citizenship instructors on a contractual basis. However, the applicant must demonstrate its ability to successfully manage all aspects of the grant-funded project, including financial management. **Private law firms and attorneys in private practice are not eligible to receive funding under this funding opportunity.**

- h. **Other Direct Costs:** Any other items proposed as direct costs. Provide an itemized list with costs and state the basis for each proposed item.

Attach a copy of the latest indirect cost rate agreement negotiated with a cognizant federal agency. If the applicant is in the process of initially developing or renegotiating a rate, upon notification that an award will be made, it should immediately develop a tentative indirect cost rate proposal based on its most recently completed fiscal year, in accordance with the cognizant agency's guidelines for establishing indirect cost rates and submit it to the cognizant agency. Applicants awaiting approval of their indirect cost proposals may also request indirect costs. When an indirect cost rate is requested, those costs included in the indirect cost pool should not also be charged as direct costs to the award. If the applicant is requesting a rate which is less than what is allowed under the program, the authorized representative of the applicant organization must submit a signed acknowledgement that the applicant is accepting a lower rate than allowed.

Any non-federal entity that has never received a negotiated indirect cost rate (except for those non-federal entities described in Appendix VII to Part 200 States and Local Government and Indian Tribe Indirect Cost Proposals, paragraph D.1.b) may elect to charge a de minimis rate of 10% of modified total direct costs (MTDC) which may be used indefinitely. As described in §200.403 Factors Affecting Allowability of Costs, costs must be consistently charged as either indirect or direct costs but may not be double charged or inconsistently charged as both. If chosen, this methodology once elected must be used consistently for all federal awards until such time as a non-federal entity chooses to negotiate for a rate, which the non-federal entity may apply to do at any time. For more information, see 2 CFR Part 200.414.


9. Documentation of Non-profit and/or Public Status

The applicant and any proposed subrecipients must provide documentation of non-profit and/or public status. Any of the following constitutes acceptable proof of non-profit status:

- a. A reference to the applicant organization's listing in the Internal Revenue Service's (IRS) most recent list of tax-exempt organizations described in section 501(c)(3) of the IRS Code.
- b. A copy of a currently valid IRS tax exemption certificate.
- c. A statement from a state taxing body, State attorney general, or other appropriate State official certifying that the applicant organization has a non-profit status and that none of the net earnings accrue to any private shareholders or individuals.
- d. A certified copy of the organization's certificate of incorporation or similar document that clearly establishes non-profit status.
- e. Any of the items in the subparagraphs immediately above for a State or national parent organization and a statement signed by the parent organization that the applicant organization is a local non-profit affiliate.
- f. A signed statement on official letterhead by an official authorized to apply for grant funds on behalf of the public entity will suffice.

Attach documentation of non-profit and/or public status to the application package.

APPENDIX B: FY 2023 CARING APPLICANT CHECKLIST

	Ineligible if Missing ¹⁰	Non-Responsive if Missing ¹¹	Required or Requested Attachments
Forms:			
		X	Form SF-424, Application for Federal Assistance
		X	Form SF-424A, Budget
		X	Form SF-424B, Assurances for Non-Construction Programs
		X	Certification Regarding Lobbying, as applicable
Other Documents:			
			Project Abstract (single-spaced, 5 page maximum)
	X		Project Narrative that clearly states applicants and subrecipients previous experience with citizenship preparation services
			Curriculum outline or syllabus
	X		Sample integration plan
			Résumés of key personnel or position descriptions for vacant key positions
			Organizational chart for the applicant and any subrecipients
	X		Memorandum of Understanding (MOU) with subrecipients signed by all parties (if applicable)
	X		Program Goals Chart
		X	Budget Table and Narrative (for applicant and subrecipients)
			Negotiated Fringe Benefit Agreement (if applicable)
			Indirect Cost Agreement (if applicable)
			Documentation of non-profit and/or public status (for applicant and subrecipients)

¹⁰ USCIS will not review if missing.¹¹ DHS will not review if missing.

APPENDIX C: FY 2023 CARING Grant Glossary

TERM	DEFINITION
Attorney	Any person who is eligible to practice law in and is a member in good standing of the bar of the highest court of any state, possession, territory, or commonwealth of the United States, or of the District of Columbia, and is not under any order suspending, enjoining, restraining, disbaring, or otherwise restricting him or her in the practice of law. See 8 CFR Part 1.2 .
Authorized practice of immigration law	Occurs when an authorized and qualified individual or organization provides accurate and current legal advice on immigration-related matters. Typically, this is limited to DOJ-accredited representatives who work for DOJ-recognized organizations or to an attorney who is a member in good standing of the bar of a U.S. state. See 8 CFR Part 292 , 8 CFR Part 103.2(a)(3) , and 8 CFR Part 1.2 .
Civics-based ESL	Civics-based ESL focuses more heavily on teaching the English structures needed to understand the concepts found within the naturalization test as well as those to assist students to become more integrated community members (this is targeted at program beneficiaries assessed at NRS level 2 – low beginning ESL).
Civics-based Literacy	Civics-based literacy includes using civics and integration concepts and themes to teach low-level students’ basic English grammar and vocabulary preparing them for civics-based ESL (this is targeted at program beneficiaries assessed at National Reporting System for Adult Education (NRS) level 1 – beginning ESL literacy).
Class cycle	The time period, such as a term or semester, when classes are held on a frequent or regular basis. This time period has a beginning and end date.
Cognizant agency for indirect costs	The Federal agency responsible for reviewing, negotiating, and approving cost allocation plans or indirect cost proposals developed under this part on behalf of all Federal agencies. The cognizant agency for indirect cost is not necessarily the same as the cognizant agency for audit. For assignments of cognizant agencies see the following: (1) For Institutions of Higher Education (IHEs) (2) For nonprofit organizations (3) For State and local governments (4) For Indian tribes

Appendix C: FY 2023 CARING Grant Glossary

TERM	DEFINITION
Cost sharing or matching	The portion of the project costs not paid by federal funds or contributions (unless otherwise authorized by Federal statute). See also 2 CFR Part 215 .
Direct costs	Costs that can be identified specifically with a particular sponsored project or an institutional activity, or easily assigned to activities with a high degree of accuracy. Examples include the salaries of staff assigned to a specific project, materials and supplies, and travel. For more information, see 2 CFR Part 200.413 .
DOJ accreditation	<p>A program allowing a specially qualified non-lawyer to represent noncitizens on behalf of a recognized organization.</p> <p>Please refer to the links below for additional information:</p> <p>Recognition of Organizations and Accreditation of Non-Attorney Representatives</p> <p>https://www.justice.gov/eoir/recognition-and-accreditation-program</p>
DOJ-accredited representative	A representative is “accredited” when the Executive Office for Immigration Review’s (EOIR) Office of Legal Access Programs gives permission to a specially qualified non-lawyer to represent noncitizens on behalf of a recognized organization. There are two kinds of accreditation: “partial” and “full.” A partially accredited representative may represent noncitizens before the Department of Homeland Security (DHS) only. A fully accredited representative may represent noncitizens before both DHS and EOIR, which includes the immigration courts and the Board of Immigration Appeals (BIA).
DOJ-recognized organization (DOJ recognition)	<p>A nonprofit organization that has permission from EOIR’s Office of Legal Access Programs to practice immigration law through accredited representatives.</p> <p>An organization is “recognized” when the Office of Legal Access Programs gives a non-profit organization in the United States permission to practice immigration law through accredited representatives before DHS only (partial accreditation) or DHS and EOIR (full accreditation). EOIR includes the immigration courts and the BIA. By regulation, a nonprofit, federal tax-exempt, religious, charitable, social service, or</p>

Appendix C: FY 2023 CARING Grant Glossary

TERM	DEFINITION
	<p>similar organization established in the United States that has been approved for recognition is called a recognized organization.</p> <p>Visit the DOJ's Recognition and Accreditation Program page to learn how an organization can apply for recognition and accreditation.</p>
Employee	<p>A person who provides services to an employer in exchange for compensation and who does not provide these services as part of an independent business. The term does not include board members or contracted individuals. The following factors of a job arrangement may indicate that an individual is an employee:</p> <ul style="list-style-type: none"> a. The employer pays the individual; b. The employer may fire the individual; c. The employer provides the individual with tools or equipment and a place to work; d. The employer trains the individual; e. The individual is required to follow the employer's instructions; f. The employer sets or can set the individual's work hours; g. The employer restricts the individual from working for others; and h. Other applicable factors.
Employer	<p>In the context of this notice of funding opportunity, an employer is an organization with public or non-profit status that has the ability to hire, pay, fire, supervise, or otherwise control the work of an employee.</p>
EOIR	<p>An agency within DOJ. Under delegated authority from the Attorney General, immigration judges and the BIA, EOIR's appellate component, interprets and adjudicates immigration cases according to United States immigration laws. Within EOIR, the Office of Legal Access Programs administers the program that grants recognition to organizations and accreditation of their representatives.</p>
Form G-28, Notice of Entry of Appearance as Attorney or Accredited Representative	<p>The form that attorneys and accredited representatives use to provide information establishing their eligibility to appear and act on behalf of an applicant, petitioner, or respondent before USCIS. Form G-28 is available at uscis.gov/g-28.</p>
Form N-400, Application for Naturalization	<p>The form used to apply for U.S. citizenship. Form N-400 is available at uscis.gov/n-400.</p>

Appendix C: FY 2023 CARING Grant Glossary

TERM	DEFINITION
Form N-648, Medical Certification for Disability Exceptions	The form for applicants who seek an exception to the English and civics testing requirements for naturalization because of physical or developmental disability or mental impairment. Form N-648 is available at uscis.gov/n-648 .
Fringe benefits	Allowances and services provided by employers to their employees as compensation in addition to regular salaries and wages.
Fringe benefit rate	The value of fringe benefits expressed as a percentage of salary. Calculate the dollar amount by applying the appropriate fringe benefit percentage rate to each employee's salary to be charged to the project. For more information, see OMB Circular A-21, OMB Circular A-87, or OMB Circular A-122.
Fringe benefit rate agreement	An agreement that has been approved by a cognizant federal agency (usually the agency that provides the most funding to the grant recipient) that establishes the rate at which an organization will request reimbursement for fringe benefits under the grant program.
FY	An abbreviation for fiscal year. The federal government's fiscal year runs from Oct. 1 to Sept. 30.
Indirect (facilities & administrative (F&A)) costs	Those costs incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. To facilitate equitable distribution of indirect expenses to the cost objectives served, it may be necessary to establish a number of pools of indirect (F&A) costs. Indirect (F&A) cost pools must be distributed to benefitted cost objectives on bases that will produce an equitable result in consideration of relative benefits derived.
Indirect cost rate proposal	The documentation prepared by a non-Federal entity to substantiate its request for the establishment of an indirect cost.
In-kind contribution	The value of non-cash contributions (such as property or services) that: <ol style="list-style-type: none"> 1. Benefit a federally assisted project or program; and 2. Are provided for free by non-federal third parties to a recipient, sub-recipient, or cost-type contractor under the award.

Appendix C: FY 2023 CARING Grant Glossary

TERM	DEFINITION
Key Personnel	Any person (employee/volunteer) who is paid by the grant and whose work is integral to the goals of the grant program. Key personnel may include an attorney, grant/program manager, BIA accredited representative, instructor, etc., This list is not exhaustive.
Legal advice	A legal opinion or recommendation offered as a guide to action and based on applying the law to a given set of facts.
Memorandum of Understanding (MOU)	A formal agreement between parties that defines each party's rights and responsibilities.
National Reporting System (NRS)	An outcome-based reporting system developed by the U.S. Department of Education for state-administered, federally funded adult education programs. For more information, see this list of NRS test benchmarks for educational functioning levels.
Nationally normed standardized assessment test	In the context of citizenship instruction, this refers to specific tests used to determine a student's English language proficiency. The Department of Education has a list of approved standardized tests .
Naturalization application services	Legal services, provided within the scope of the authorized practice of immigration law, that help immigrants go through the naturalization application and interview process. Services may include naturalization eligibility screening, legal advice, Form N-400 preparation and submission, and interview preparation.
Naturalization eligibility screening	A systematic assessment conducted by an attorney or BIA-accredited representative to determine if an individual is eligible to apply for U.S. citizenship. Eligibility screenings include legal advice.
Non-duplicated citizenship students	A student enrolled in a grant-funded citizenship class for the first time. A program cannot count a student as newly enrolled more than once during the grant performance period, even if the student enrolls in multiple classes.
Nonprofit organization	Any corporation, trust, association, cooperative or other organization which: <ul style="list-style-type: none"> a. Operates primarily for scientific, educational, service, charitable or similar purposes in the public interest; b. Is not organized primarily for profit; and

Appendix C: FY 2023 CARING Grant Glossary

TERM	DEFINITION
	c. Uses its net proceeds to maintain, improve and/or expand its operations.
Non-responsive application	An application that does not meet one or more of the requirements listed under Eligibility Information – Non-Responsive Applications in the notice of funding opportunity. We will not review applications that are non-responsive.
Partner organization	Grant applicants may include a partner organization in their proposal. The partner may provide a portion of the direct services or some other contribution to the applicant’s proposed grant project. A partner organization is considered a “subrecipient” if the organization will receive a portion of the grant funding to provide additional or complementary direct services. The partner organization may provide citizenship instruction, naturalization application services, or both.
Period of performance	The total estimated time interval between the start of an initial Federal award and the planned end date, which may include one or more funded portions, or budget periods. Identification of the period of performance in the Federal award per § 200.211(b)(5) does not commit the awarding agency to fund the award beyond the currently approved budget period.
Private practice	To engage in one’s profession as an independent provider rather than as an employee.
Pro bono attorney	An attorney who provides legal services voluntarily and without payment as a public service.
Quarter	There are four quarters in a fiscal year. The quarterly dates are as follows: Quarter 1: October 1 to December 31 Quarter 2: January 1 to March 31 Quarter 3: April 1 to June 30 Quarter 4: July 1 to September 30
Qualified Instructor	Under the CIGP, a qualified instructor is one with a degree in education (K-12 Social Studies, English Language Arts, History, Linguistics, Teaching English to Speakers of Other Languages (TESOL), or Adult Education) or someone with at least one year of experience as the lead teacher in a class for adult immigrants. Although not a requirement, programs whose instructors have the following education, certification, and/or experience are generally more likely to be scored higher than programs that do not:

Appendix C: FY 2023 CARING Grant Glossary

TERM	DEFINITION
	<ul style="list-style-type: none"> a.) Hold a degree in TESOL; or b.) Hold TESOL certification from a state licensing agency; or c.) Have a minimum of two years of experience in TESOL instruction in a classroom setting for an adult education program that utilizes a textbook and a structured curriculum.
Qualified Legal Service Provider	<p>Under the CIGP, a qualified legal service provider is one of the following:</p> <ul style="list-style-type: none"> a.) A DOJ Accredited Representative serving a DOJ Recognized Organization. Partial accreditation is permitted; or b.) An attorney who is an employee of the applicant or the subrecipient organization. <ul style="list-style-type: none"> 1.) Attorneys working under this grant must have training in immigration law and be able to provide legal representation to clients. 2.) Hours charged to the grant should be in alignment with the goals of the application. 3.) Pro bono or volunteer attorneys may be used to supplement the program but may not: <ul style="list-style-type: none"> i. Serve as the applicant's sole provider of immigration legal services; or ii. Serve as a supervisor to staff members who provide naturalization application services but who are not qualified legal service providers.
Representation	Includes "practice" and "preparation" as defined in 8 CFR Part 1.2 .
Subrecipient	An entity, usually but not limited to non-Federal entities, that receives a subaward from a pass-through entity to carry out part of a federal award; but does not include an individual that is a beneficiary of such award. A subrecipient may also be a recipient of other Federal awards directly from a federal awarding agency. Under USCIS grant program applicants must include a Memorandum of Understanding signed by the applicant and potential subrecipient. Potential subrecipient must also have a UEI number.
Subcontract	A legal contract in which the grant recipient hires an individual, business or organization to do a specific task or set of tasks. Subcontracting is permitted under the Citizenship and Integration Grant Program, but applicants may <i>only</i> propose a subcontract for specific tasks, such as hiring additional citizenship instructors on a contractual basis. Applicants

Appendix C: FY 2023 CARING Grant Glossary

TERM	DEFINITION
	may not enter into a subcontract with a private attorney. Applicants must demonstrate their ability to successfully manage all aspects of the grant-funded project, including financial management.
Unique Entity Identifier (UEI)	A unique nine-character identification number requested in, and assigned by, the System for Award Management (Sam.gov). Organizations must request a UEI prior to applying for this funding opportunity.

**APPENDIX D: CLASSES OF ADMISSION ELIGIBLE FOR
SERVICES UNDER THE USCIS CARING PROGRAM**

Class of Admission	Description
Refugees	
CU6	Cuban refugees (P.L. 89-732 of 1966)
CU7	Non-Cuban spouses or children of Cuban refugees
RE6	Other Refugees
RE7	Spouse of RE6
RE8	Children of RE6
RE9	Other relatives
Asylees	
AS6	Asylees
GA6	Iraqi asylees
SY6	Syrian asylees
AS7	Spouses of AS6
GA7	Spouses of GA6
SY7	Spouses of SY6
AS8	Children of AS6
GA8	Children of GA6
SY8	Children of SY6
Cuban and Haitian Entrants	
HA6	Haitian asylum applicants
HB6	Haitian parolees
HC6	Haitian children without parents
HD6	Haitian children orphaned in the United States
HE6	Haitian children abandoned by parents
HA7	Spouses of HA6
HB7	Spouses of HB6
HC7	Spouses of HC6
HD7	Spouses of HD6
HE7	Spouses of HE6
HA8	Children of HA6
HB8	Children of HB6
HC8	Children of HC6
HD8	Children of HD6
HE8	Children of HE6
HA9	Unmarried sons/daughters of HA6
HB9	Unmarried sons/daughters of HB6
HC9	Unmarried sons/daughters of HC6
HD9	Unmarried sons/daughters of HD6
HE9	Unmarried sons/daughters of HE6
HH6	Parolees adjusting under the Help HAITI Act of 2010, adjustments
CH6	Cuban Haitian entrants, adjustments (P.L. 99-603)

Special Immigrant Visas	
NC6	NACARA Section 202 principal
NC7	Spouse of NC6
NC9	Unmarried son/daughter of NC6
Z15	NACARA Section 203 cancellation of removal
SI1	Special immigrant interpreters who are nationals of Iraq or Afghanistan, new arrivals
SI6	Special immigrant interpreters who are nationals of Iraq or Afghanistan, adjustments
SI2	Spouses of SI1 or SI6, new arrivals
SI7	Spouses of SI1 or SI6, adjustments
SI3	Children of SI1 or SI6, new arrivals
SI8	Children of SI1 or SI6, adjustments
SL1	Juvenile Court Dependent
SL6	Juvenile Court Dependents, adjustments (Special Immigrant Juveniles, SIJs)
SQ1	Certain Iraqis and Afghans employed by U.S. Government, new arrivals
SQ6	Certain Iraqis and Afghans employed by U.S. Government, adjustments
SQ2	Spouses of SQ1 or SQ6, new arrivals
SQ7	Spouses of SQ1 or SQ6, adjustments
SQ3	Children of SQ1 or SQ6, new arrivals
SQ8	Children of SQ1 or SQ6, adjustments
Victims of Human Trafficking – T Visas	
ST6	Victim of severe form of trafficking activity nonimmigrants
ST7	Spouse of ST6
ST8	Child of ST6
ST9	Sibling of ST6 (if eligible)
ST0	Parent of ST6 (if eligible)
Victims of Criminal Activity – U Visas	
SU6	Victim of criminal activity nonimmigrants
SU7	Spouse of SU6
SU8	Child of SU6
SU9	Sibling of SU6 (if eligible)
SU0	Parent of SU6 (if eligible)
Abused Spouses, Children and Parents Under the Violence Against Women Act (VAWA)	
IB1	Self-petitioning spouse of a U.S. citizen
IB2	Self-petitioning child of a U.S. citizen
IB3	Child of an alien classified as IB1 or IB6
IB6	Self-petitioning spouse of a U.S. citizen
IB7	Self-petitioning child of a U.S. citizen
IB8	Child of an alien classified as IB1 or IB6

Note: If a grant recipient encounters a class of admission not on this list, but that may indicate a vulnerable immigrant, please contact your USCIS grant program officer for guidance.

APPENDIX E: USCIS RESOURCES FOR CITIZENSHIP EDUCATION PROGRAMS

Educators and volunteers play a critical role in helping immigrants prepare for U.S. citizenship. The USCIS Citizenship Resource Center provides an array of resources and materials to support educators and programs working to prepare immigrants for the naturalization process. Below are a few key resources that all programs should be familiar with. For a full list of resources, please visit the Citizenship Resource Center at uscis.gov/citizenship.

USCIS Adult Citizenship Education Program Development Guide: Building an Adult Citizenship Program

This program development guide outlines a step-by-step process to create or sustain an adult citizenship education program and includes products and resources from USCIS for use at each stage of program development

Elements of Program Quality for Adult Citizenship Education

This document provides a general framework for preparing permanent residents for the civics and English components of the naturalization interview and test.

USCIS Guide to Creating an Adult Citizenship Education Curriculum

This guide assists adult education program administrators and teachers in developing a citizenship curriculum and thematic lessons, choosing textbooks and supplemental materials, and creating effective learning activities.

Adult Citizenship Education Sample Curriculum for a High Beginning ESL Level Course

This publication outlines the components, structure, and process involved with creating an adult citizenship education curriculum.

Additional Citizenship Education Resources:

- [Resources for Educators About the Naturalization Process](#)
- [Prepare Students for the Interview and Test](#)
- [Learn New Teaching Techniques](#)
- [Start a Citizenship Program](#)
- [Promote a Citizenship Program](#)
- [Train and Develop Staff](#)

EXHIBIT N

**The U.S. Department of Homeland Security (DHS)
Notice of Funding Opportunity (NOFO)**

**FY 2024 Citizenship and Integration Grant Program
Citizenship Instruction and Naturalization Application Services**

All entities wishing to do business with the federal government must have a unique entity identifier (UEI). The UEI number is issued by the System for Award Management (SAM) system.

UEI Updates in Grant Application Forms:

On April 4, 2022, the Data Universal Numbering System (DUNS) Number was replaced by a new, non-proprietary identifier requested in, and assigned by, SAM.gov. This new identifier is the UEI. Entities that had a DUNS Number were automatically assigned a UEI. New entities needing a UEI must register in SAM.gov at: <https://sam.gov/content/entity-registration>.

Additional Information can be found on Grants.gov:

<https://www.grants.gov/web/grants/forms/planned-uei-updates.html>.

Grants.gov registration information can be found at: <https://www.grants.gov/web/grants/register.html>.

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A. Program Description

1. Issued By

U.S. Department of Homeland Security (DHS), U.S. Citizenship and Immigration Services (USCIS), External Affairs Directorate (EXA), Office of Citizenship, Partnership and Engagement (OCPE)

2. Assistance Listing Number

97.010

3. Assistance Listing Title

Citizenship Education and Training

4. Funding Opportunity Title

FY 2024 Citizenship and Integration Grant Program: Citizenship Instruction and Naturalization Application Services (CINAS)

5. Funding Opportunity Number

DHS-24-CIS-010-002

6. Authorizing Authority for Program

Further Consolidated Appropriations Act, 2024 (Pub. L. 118-47) Division C, Title IV, US Citizenship and Immigration Services, Federal Assistance

7. Appropriation Authority for Program

Further Consolidated Appropriations Act, 2024 (Pub. L. 118-47) Division C, Title IV, US Citizenship and Immigration Services, Federal Assistance

8. Announcement Type

Initial

9. Program Overview, Objectives, and Priorities

a. Overview

OCPE is charged with promoting instruction and training on the rights and responsibilities of citizenship. USCIS recognizes that naturalization is a key milestone in the civic integration of immigrants. Naturalization requirements, such as knowledge of English, U.S. history, and government,

encourage civic learning and build a strong foundation upon which immigrants can fully integrate into American society. Through preparing for naturalization, immigrants gain tools to become successful citizens and meet their responsibilities as United States citizens.

The goal of the Citizenship and Integration Grant Program is to expand the availability of high-quality citizenship preparation services for lawful permanent residents (LPRs) across the nation and to provide opportunities for immigrants to gain the knowledge and skills necessary to integrate into the fabric of American society.

Since it began in 2009, the Citizenship and Integration Grant Program has awarded more than \$55 million through 644 competitive grants to immigrant-serving organizations in 41 states and the District of Columbia. Now in its 16th year, the program has helped more than 300,000 LPRs prepare for citizenship.

The Citizenship Instruction and Naturalization Application Services (CINAS) funding opportunity provides support to organizations that offer citizenship preparation services to LPRs. Additional activities that support this goal include identifying, implementing, and sharing best practices in citizenship preparation; increasing the use of and access to technology in citizenship preparation programs; working with local libraries and museums which serve as vital resources for immigrant communities; and incorporating strategies to foster welcoming communities as part of the citizenship and civic integration process.

b. Goals, Objectives, and Priorities

In Fiscal Year (FY) 2024, approximately \$10 million in federal funding is available for eligible organizations to provide direct citizenship preparation services to LPRs through this funding opportunity. USCIS anticipates awarding up to 40 grants of up to \$300,000 each.

Proposed services **must** include the following two components:

1.) Citizenship Instruction Services:

Educational services that provide enrolled LPRs with the skills and knowledge needed to prepare for citizenship, including instruction in English as a Second Language (ESL), U.S. history and government, and the naturalization process.

2.) Naturalization Application Services:

Within the scope of the authorized practice of immigration law, grant recipients must assist eligible program participants in preparing and submitting Form N-400, Application for Naturalization, preparing for the naturalization interview, and providing ongoing case management as needed.

For detailed information on the two mandatory program components, see Section C.2, Eligibility Information below.

Partnerships

Partnerships are encouraged. Applicants may include partnerships with other public or non-profit organizations in their proposal. The principal applicant must directly provide either citizenship instruction or naturalization application services, or both. A partner organization is a “subrecipient” if the organization will receive a portion of the grant funding to provide additional or complementary

direct citizenship instruction or naturalization application services. Please see Section C.3.c below for more information on subrecipients.

c. Alignment to Program Purpose and DHS Strategic Plan

The Citizenship and Integration Grant Program supports the objectives of [Executive Order 14012, Restoring Faith in Our Legal Immigration Systems and Strengthening Integration and Inclusion Efforts for New Americans](#), the [USCIS FY 2023-2026 Strategic Plan](#), and the U.S. Department of Homeland Security's [Strategic Plan for Fiscal Years 2020-2024](#), by promoting integration, inclusion, and citizenship. Furthermore, the goals of the Citizenship and Integration Grant Program address the DHS mission to enforce and administer our immigration laws (captured in the [Third Quadrennial Homeland Security Review](#)) and [USCIS' mission and values](#), as the program provides immigrants instruction on the rights and responsibilities of U.S. citizenship and information and support on how to apply for naturalization within the authorized practice of immigration law.

10. Performance Measures

For this grant program, performance will be evaluated based on the following metrics:

- a. Cumulative percentage of enrolled students who post-test using the CASAS Citizenship Assessment (minimum goal of 80%);
- b. Cumulative percentage of post-tested students demonstrating educational gains as measured by the increase between pre- and post-test scores (minimum goal of 80%); and
- c. Three performance metrics for which the minimum goals vary based on funding level, as described in the chart below:
 - 1) Number of newly enrolled non-duplicated LPRs in citizenship instruction classes;
 - 2) Number of LPRs for whom your organization will provide naturalization eligibility screening;
 - 3) Number of LPRs for whom your organization will prepare and file a Form N-400, Application for Naturalization, and Form G-28, Notice of Entry of Appearance as Attorney or Accredited Representative.

Minimum Performance Goals for Two-Year Period of Performance				
Funding Level		Newly enrolled non- duplicated LPRs in citizenship classes	LPRs receiving naturalization eligibility screening	LPRs filing Forms N-400 and G-28
from	To			
\$270,000	\$300,000	200	200	200
\$240,000	\$269,999	180	180	180
\$210,000	\$239,999	160	160	160
\$180,000	\$209,999	140	140	140
\$150,000	\$179,999	120	120	120

B. Federal Award Information

1. Available Funding for the NOFO

\$10,000,000

2. Projected number of Awards

40

3. Maximum Award Amount

\$300,000

4. Period of Performance

24 months

Note: extensions are permitted. Grantees may request a no-cost extension in order to complete all project activities. See [Section H, Additional Information, Period of Performance Extensions](#), for more information.

5. Projected Period of Performance Start Date

10/01/2024

6. Projected Period of Performance End Date

09/30/2026

7. Funding Instrument Type

Grant

C. Eligibility Information

1. Eligible Applicants

The following entities are eligible to apply to this announcement:

- a. State governments
- b. County governments
- c. City or township governments
- d. Special district governments
- e. Independent school districts
- f. Public or state-controlled institutions of higher education
- g. Indian/Native American tribal governments (federally recognized)
- h. Indian/Native American tribal organizations (other than federally recognized)
- i. Indian/Native American Tribally Designated Organizations
- j. Public/Indian Housing Authorities
- k. Nonprofits with 501(c)(3) IRS status, other than institutions of higher education
- k. Special district governments

2. Applicant Eligibility Criteria

Applicants must demonstrate experience with, and extensive knowledge of the community they propose to serve and should describe how the proposed program design will address the specific integration needs of this community, and how through citizenship instruction and naturalization application services, the LPRs served under the program will gain the skills and knowledge required to become successful citizens.

Applicants and any proposed subrecipients must demonstrate recent experience with the provision of citizenship preparation services. Specifically, at least one year of experience within the past three years:

- a. Providing citizenship instruction in a classroom setting that follows a curriculum and utilizes a textbook; and
- b. Preparing and filing Forms N-400 and G-28 on behalf of qualified LPRs and within the authorized practice of immigration law. See Appendix D for definitions of these terms.

Proposed services **must** include the following two mandatory components:

- a. **Citizenship Instruction Services** to prepare LPRs for the naturalization process. Programs must include:
 - 1) **Citizenship Instruction**, which must include the following content areas:
 - a) ESL instruction in reading, writing, and speaking;
 - b) U.S. history and government instruction delivered in English for test preparation and the promotion of civic integration,
 - c) The naturalization process and eligibility interview, with instruction delivered in English.
 - 2) **Course Curriculum**, which must include all components outlined in the [USCIS Guide to Creating an Adult Citizenship Education Curriculum](#):
 - a) Instruction in U.S. history and government for test preparation and the promotion of civic integration;
 - b) Activities that promote civic and linguistic integration;
 - c) ESL instruction in reading, writing, and speaking for the naturalization test, naturalization process;
 - d) Instruction on the naturalization interview and Form N-400; and
 - e) Instruction on the rights and responsibilities of citizenship, including information on voting rights and responsibilities, how to register to vote after becoming a citizen, the basics of becoming an informed voter, and the penalties for voting before becoming a citizen under Division C of PL 104–208, 110 Stat. 3009-546.¹
 - 3) **Course Textbooks**, which must align with the skill level of the students in the class:
 - a) Only hard copies of published textbooks may be used. Compilations of worksheets or handouts will not be accepted; and
 - b) All students must be issued a textbook for their own personal use to keep. These textbooks are an allowable expense under the grant.
 - 4) **Assessments will include the following:**

¹ <https://www.congress.gov/104/plaws/publ208/PLAW-104publ208.pdf>

- a) A standardized test to place students at the appropriate National Reporting System (NRS)² level.
- b) CASAS Citizenship Assessment to pre- and post-test students to gauge acquisition of civics knowledge and content.

At least 80% of enrolled students participate in post-testing; and

At least 80% of post-tested students demonstrate an educational gain.

USCIS provides grant recipients and subrecipients with free copies of the Assessment for Adult Citizenship Education (AACE). We strongly encourage, but do not require, recipients to use the AACE to assess civics learning gains in addition to an ESL assessment.

- 5) **Course Structure**, which must include at least 40 hours of citizenship instruction over a 9 to 12-week class cycle with managed enrollment to students at the National Reporting System (NRS) Low Beginning to Advanced ESL Levels 2-6;
 - a) Students who pre-test at the NRS Beginning ESL Literacy Level 1 are not eligible to participate in grant-funded classes;
 - b) Although grantees may offer Levels 2-6, primary focus must be placed on lower to mid-level learners. Additional information about NRS Levels is available on the [National Reporting System for Adult Education](#) website; and
 - c) Tutoring services may be counted toward the minimum 40 hours of classroom instruction under the following conditions:
 - i. The student is receiving preparatory tutoring while on a waiting list for the next quarter classes;
 - ii. The student has been pre-tested;
 - iii. The student enrolls in and attends citizenship class;
 - iv. Provided by a volunteer if the volunteer is supervised by the paid instructor.
- 6) **Virtual Classes, if offered:** Applicants are encouraged to primarily provide in-person instruction. However, applicants may propose to supplement in-person classes with virtual classes if it allows them to extend the reach of their services.
 - a) If virtual classes are offered, the student population should be within 200 miles/3 hour drive time, so that participants are able to appear in-person if needed;
 - b) Applicants should strive to serve remote, underserved, isolated and/or rural students; Applicants must describe what population is being served virtually;
 - c) Instructors may work from anywhere within the U.S;
 - d) Instructors must meet all the same professional requirements of an in-person classroom teacher, plus one year of experience with virtual instruction;
 - e) Instructors should incorporate best practice strategies in virtual classes, such as break out rooms for small group work, use of slides, chat feature, etc.;
 - f) First lessons should include a thorough introduction to students on using technology needed for virtual classes;
 - g) Applicants should set the expectation that students be free from distractions during class;
 - h) Outreach plan for virtual classes should reflect how and where applicants will be recruited;
 - i) Classes should be offered live, not recorded.

² The National Reporting System for Adult Education (NRS) levels are currently in transition. When new levels have been adopted by USCIS, USCIS will update this Notice of Funding Opportunity.

- 7) **Qualified Instructors:** Qualified citizenship instructors who have degrees in education (K-12 Social Studies, English Language Arts, History, Linguistics, Teaching English to Speakers of Other Languages (TESOL), or Adult Education) or who have at least one year of experience as the lead teacher in a class for adult immigrants. Although not a requirement, programs whose instructors have the following education, certification, and/or experience are generally more likely to be scored higher than programs that do not:
- a) Hold a degree in TESOL;
 - b) Hold TESOL certification from a state licensing agency; or
 - c) Have a minimum of two years of experience in TESOL instruction in a classroom setting for an adult education program that utilizes a textbook and a structured curriculum.
- 8) **Integration Activities:** The intent of this requirement is to encourage students to extend knowledge acquisition beyond traditional classroom instruction through opportunities to experience and navigate American civic life firsthand through in-depth learning activities. Applicants are encouraged to draw upon their local resources, venues, and landmarks when conceptualizing and designing these civic integration learning activities. Suggested categories for the required integration activities include but are not limited to:
- a) **Site-based civic integration activities:** Local trips outside the classroom to sites and landmarks of historical and/or cultural significance, libraries, museums, other local public entities, and organizations that promote public safety, etc.;
 - b) **Classroom-based civic integration activities:** Activities that may involve guest speakers such as local civic leaders, public servants, or program alumni to provide the opportunity for student interaction and exchange, or the use of multimedia and/or materials-based methods that promote an enhanced understanding of key moments in U.S. history and/or the form and function of local, state, and federal government;
 - c) **Civic participation:** Activities that encourage students to take participatory learning beyond the classroom by attending a public meeting, volunteering, or participating in local civic institutions; and
 - d) **Other integration activities:** Activities that promote in-depth understanding of the student's role as a future citizen of the United States, including the rights and responsibilities of citizenship; our shared American history; government functions, structure, and laws; geography; and traditions, symbols, and holidays. These can be external or in-class.

For more detailed information on the content and competencies that applicants are required to address in grant-funded classes, please review the [Adult Citizenship Education Sample Curriculum for a High Beginning ESL Level Course](#).

9) **Citizenship Class for Individuals Exempt from English Language Requirement**

Under [Section 312b of the Immigration and Nationality Act](#), certain individuals may be exempt from the English reading, writing, and speaking portions of the USCIS naturalization test.

Grant applicants may offer civics only courses for students who qualify under this exemption. Applicants are required to verify student eligibility.

This instruction may be provided in English or in another language. If grant applicant plans to offer a class in another language, it must follow the guidelines below:

- a) Applicants may include this class type as a supplement to their main citizenship course offerings, not in place these courses.
- b) Classes may be taught in one chosen language, largely based on demographics in the area.
- c) Applicants must welcome any 312b eligible students into their language-exempt civics course.
- d) Applicants must advertise classes appropriately to reach the targeted demographic.
- e) The course must encourage community integration for a student body with limited English proficiency.
- f) The grantees must develop unique program requirements for the specialized course.

Grant recipients who provide civics-only instruction must still provide the minimum number of LPRs with grant-funded citizenship instruction in English over the two-year period of performance. While these civics-only students may not be counted for grant performance metrics, grant recipients may use grant funds to pay for English exempt course expenses.

Note, this does not apply to applicants approved for N-648, Medical Certification for Disability Exceptions, based on physical or developmental disability or mental impairment.

- b. Naturalization Application Services**, within the scope of the authorized practice of immigration law, to support LPRs in the naturalization application and interview process. Grant recipients are encouraged to use and promote the use of [MyUSCIS](#) for filing Forms N-400. Programs must include:

1) Qualified Legal Service Providers:

A qualified legal service provider will be one of the following:

- a) A U.S. Department of Justice (DOJ) Accredited Representative employed by a DOJ Recognized Organization. Partial accreditation is permitted; or
- b) An attorney who is an employee of the applicant or the proposed subrecipient organization.
 - 1) Attorneys working under this grant must have training or experience in immigration law and be able to provide legal representation to clients.
 - 2) Hours charged to the grant should be in alignment with the goals of the application.
 - 3) Pro bono or volunteer attorneys may be used to supplement the program but may not:
 - i. Serve as the applicant's sole provider of immigration legal services; or
 - ii. Serve as a supervisor to staff members who provide naturalization application services but who are not qualified legal service providers.

The organization must demonstrate an established process to refer individuals with complex immigration matters beyond the scope of the services provided under this grant to a qualified attorney.

- 2) Eligibility Screenings** must include an assessment of each program participant's:
 - a) Ability to meet the educational requirements of naturalization; and
 - b) Ability to meet other legal requirements of naturalization.

For more information, see the [USCIS Naturalization Eligibility Worksheet](#).

- 3) Case Management** must include:

- a) The preparation and submission of Form N-400, Application for Naturalization;³
- b) The preparation and submission of Form G-28, Notice of Entry of Appearance as Attorney or Accredited Representative;⁴
- c) Filing other related forms or documents (such as Form N-648, Medical Certification for Disability Exceptions and Form I-912, Request for Fee Waiver);
- d) Interview preparation;
- e) A representative's appearance at the naturalization interview when applicable⁵; and
- f) Responding to any Requests for Evidence (RFEs) when applicable.

4) **Virtual Services:** Applicants are encouraged to provide primarily in-person naturalization application services. However, we will permit virtual services if it allows them to extend the reach of their services.

- a) If virtual services are offered, the individuals served should be within 200 miles/3-hour drive time, so that individuals are able to appear in-person if needed;
- b) Applicants should strive to serve remote, underserved, isolated, and/or rural LPRs; Applicants must describe what population is being served virtually;
- c) Qualified legal services providers must meet the same professional requirements of an in-person legal services provider;
- d) Outreach plan for virtual services should reflect how and where LPRs will be recruited;
- e) Applicant must describe plans for virtually verifying LPR status and an individual's identity;
- f) Applicant must describe plan for how to collect digital signatures from LPRs.

3. Subawards and Beneficiaries

a. Subaward allowability

Subrecipients are allowed under this grant opportunity. A "subrecipient" is an organization which will receive a portion of the grant funding to provide additional or complementary citizenship instruction or naturalization application services.

b. Subrecipient Eligibility

Subrecipients must meet the same eligibility requirements as the primary applicants, as outlined in Sections C.1 and C.2.

c. Other subaward information

³ Grant recipients are strongly encouraged to file forms electronically whenever possible. In the case that e-filing is not a viable option, the grantee's legal service provider is required to mail the naturalization application package to USCIS on behalf of the client. Applications may not be given to the client to mail.

⁴ At grant-supported group processing events, a Form G-28 may not be required if the *pro bono* attorney filling out the Form N-400 determines that the services provided would not be considered "practice" or "preparation", as those terms are defined in 8 C.F.R.CFR 1.2. Such *pro bono* attorneys, however, will be required to complete the preparer section of the Form N-400.

⁵ Under the USCIS grant program, legal representatives are not required to attend all naturalization interviews. However, it is recommended that legal representatives attend interviews of clients who have a higher need for in-person representation.

The principal applicant must complete a Memorandum of Understanding (MOU) with the prospective subrecipient and submit it with the application. The principal applicant must clearly demonstrate how it will monitor the prospective subrecipient's performance and ensure that the prospective subrecipient complies with all grant award conditions and data reporting requirements. The MOU must state the minimum number of students to whom the subrecipient will provide services and how grant funding will be allocated to fund the services. Prospective subrecipients must have their own individual UEI number and will be responsible for financial and performance reporting. Subrecipients must submit their reports to the principal applicant for submission to DHS.

d. Beneficiaries or Participants

- 1) This NOFO and any subsequent federal awards create no rights or causes of action for any participant or beneficiary.
- 2) Participants are entities or individuals that partner with a recipient or subrecipient but do not receive any funding under the award (whether through a subaward or contract) or any direct benefit. For example, entities who agree at no cost to help a recipient or subrecipient by sharing information or providing training.

4. Other Eligibility Restrictions

For-profit law firms and attorneys in private practice are not eligible to receive funding under this funding opportunity (See the Glossary in Appendix B for the definitions of "representation" and "employee").

Applicants may apply to multiple funding opportunities, with exceptions noted below. USCIS reserves the right to only fund one award.

Current recipients and subrecipients under the FY 2023 Citizenship Instruction and Naturalization Application Services (DHS-23-CIS-010-002) and the Community and Regional Integration Network Grant Program (DHS-23-CIS-010-003) funding opportunities are not eligible to apply.

Any applicant that does not possess the mandatory required minimum of one year experience in the past three years with both citizenship instruction and naturalization application services (independently or in partnership with a qualified potential subrecipient), is not eligible to receive funding under this funding opportunity.

Any applicant that does not propose offering both required services – citizenship instruction and naturalization application services (independently or in partnership with a qualified potential subrecipient), in accordance with the above-described programmatic requirements is not eligible to receive funding under this funding opportunity.

Any applicant that does not propose to achieve the minimum performance goals outlined in section A.10 of the funding opportunity announcement is not eligible to receive funding under this funding opportunity.

Any application that does not include all forms listed as required on the Applicant Checklist, located in Appendix B, is not eligible to receive funding under this funding opportunity.

If DHS determines at any point during the review process that an application does not meet these eligibility requirements, the application will be removed from further consideration.

Non-Responsive Applications

An application will be deemed non-responsive and will be removed from further consideration if:

- a. Form SF-424 – Application for Federal Assistance is missing.
- b. Form SF-424A – Budget is missing.
- c. Form SF-424B – Assurances – Non-Construction Programs is missing.
- d. The applicant's Authorized Organization Representative (AOR) is not registered in SAM.
- e. The application does not include a Budget Narrative and Budget Table.
- f. The application does not include a Project Narrative.

5. Cost Share or Match

There is a **minimum cost share requirement for this program of 10%** of the total requested funding amount. Applicants should clearly identify which budget items are to be supported by federal grant funding and which are to be supported by in-kind contributions and/or other funding sources, along with an estimate of the value of these non-federal funding sources. All proposed cost share contributions must be clearly described in the budget portion of the proposal. Applicants will be scored on this during the technical review.

Acceptable forms of cost share items include:

- Volunteer services: Rates for volunteer services must be consistent with those paid for similar work.
- Employee time: Employee's regular rate of pay.
- Supplies: Fair market value of the supplies at the time of donation.
- Cash contributions: Cash value.
- Equipment, building, or land: Fair market value or rental value at the time of application, as established by an independent appraisal.
- Project co-funding: Actual cost incurred.

D. Application and Submission Information

1. Key Dates and Times

- a. **Application Start Date:** 04/24/2024
- b. **Application Submission Deadline:** 06/21/2024 at 11:59PM EST
All applications must be received by the established deadline.
- c. **Anticipated Award Date:**
No later than 09/30/2024

NOTE: The application must be received in Grants.gov by the date and time listed above. If an application is received after the deadline, it will not be considered. Applicants will receive a confirmation from Grants.gov once the application is successfully submitted.

All applications are time stamped by the Grants.gov system when submitted and recipients are notified accordingly. The federal office will download all applications that are received by the deadline date and time as indicated on the NOFO. **Late applications will not be accepted.**

d. Other Key Dates

Event	Suggested Deadline for Completion
Initial Registration at SAM.gov (includes UEI issuance)	Four weeks before actual submission deadline
Obtaining UEI Number	Four weeks before actual submission deadline
Obtaining a valid EIN	Four weeks before actual submission deadline
Updating SAM registration	Four weeks before actual submission deadline
Starting application in Grants.gov	One week before actual submission deadline

2. Address to Request Application Package

Application forms and instructions are available at Grants.gov. To access these materials, go to <https://www.grants.gov/> and select “Applicants” then “Apply for Grants.” To obtain the application package, select “Download a Grant Application Package.” Enter the Assistance Listing and/or funding opportunity number located on the cover of this NOFO, select “Download Package,” and then follow the prompts to download the application package.

For a hard copy of the full NOFO, please email a request to:

Jacqueline Greely

Grants Officer

CISMailbox@hq.dhs.gov

If you use assistive technology and are unable to access any materials on Grants.gov, please email the Support Center at support@grants.gov.

Applications will be processed through the Grants.gov portal. If you experience difficulties accessing information or have any questions, please call 1-800-518-4726.

3. Unique Entity Identifier and System for Award Management (SAM)

Each applicant, unless they have a valid exception under 2 C.F.R. § 25.110, must:

- Be registered in SAM.gov before application submission.
- Provide a valid UEI in its application.
- Always maintain an active SAM registration with current information during the federal award process.

Note: Per 2 C.F.R. § 25.300, subrecipients are NOT required to go through the full SAM registration process. First-tier subrecipients (meaning entities receiving funds directly from the recipient) are only required to obtain a UEI through SAM, but they are not required to complete the full SAM registration to obtain a UEI. Recipients may not make subawards unless the subrecipient has obtained and provided the UEI.

Lower-tier subrecipients (meaning entities receiving funds passed through by a higher-tier subrecipient) are not required to have a UEI and are not required to register in SAM. Applicants are also not permitted to require subrecipients to register in SAM.

4. Steps Required to Obtain a UEI, Register in SAM.gov, and Submit an Application

To apply for a federal award under this funding opportunity, all applicants must:

- a. Have an account with <https://login.gov/>;
- b. Register for, update, or verify their SAM account and ensure the account and EIN are active before submitting the application;
- c. Create a [Grants.gov](https://grants.gov/) account;
- d. Add a profile to a Grants.gov account;
- e. Establish an Authorized Organizational Representative (AOR) in Grants.gov;
- f. Submit application in Grants.gov; and
- g. Continue to maintain an active SAM registration with current information, including information on a recipient's immediate and highest-level owner and subsidiaries, as well on all predecessors that have been awarded a federal contract or grant within the last three years, if applicable, at all times during which it has an active federal award or an application or plan under consideration by a federal awarding agency.

Applicants are advised that DHS may not make a federal award until the applicant has complied with all applicable UEI and SAM requirements. Therefore, an applicant's SAM registration must be active not only at the time of application, but also during the application review period and when DHS is ready to make a federal award. Further, as noted above, an applicant's or recipient's SAM registration must remain active for the duration of an active federal award. If an applicant's SAM registration is expired at the time of application, expires during application review, or expires any other time before award, DHS may determine that the applicant is not qualified to receive a federal award and use that determination as a basis for making a federal award to another applicant.

5. Electronic Delivery

DHS is participating in the Grants.gov initiative to provide the grant community with a single site to find and apply for grant funding opportunities. DHS encourages or requires applicants to submit their applications online through Grants.gov, depending on the funding opportunity. For this funding opportunity, DHS requires applicants to submit applications through Grants.gov.

6. How to Register to Apply through Grants.gov

Instructions: Registering in Grants.gov is a multi-step process. Read the instructions below about registering to apply for DHS funds. Applicants should read the registration instructions carefully and prepare the information requested before beginning the registration process. Reviewing and assembling the required information before beginning the registration process will alleviate last-minute searches for required information.

The registration process can take up to four weeks to complete. Therefore, registration should be done in sufficient time to ensure it does not impact your ability to meet required application submission deadlines.

Organizations must have a Unique Entity Identifier (UEI) Number with an active System for Award Management (SAM) registration, and Grants.gov account to apply for grants. If individual applicants are eligible to apply for this grant funding opportunity, then you may begin with step 3, Create a Grants.gov account, listed below.

Creating a Grants.gov account can be completed online in minutes, but UEI and SAM registrations may take several weeks. Therefore, an organization's registration should be done in sufficient time to ensure it does not impact the entity's ability to meet required application submission deadlines. Complete organization instructions can be found on Grants.gov here:

<https://www.grants.gov/web/grants/applicants/organization-registration.html>.

- a. **Register with SAM:** All organizations applying online through Grants.gov must register with the System for Award Management (SAM). Failure to register with SAM will prevent your organization from applying through Grants.gov. SAM registration must be renewed annually.

For more detailed instructions for registering with SAM, refer to:

<https://www.grants.gov/web/grants/applicants/organization-registration/step-2-register-with-sam.html>.

- b. **Create a Grants.gov Account:** The next step is to register an account with Grants.gov. Follow the on-screen instructions or refer to the detailed instructions here:
<https://www.grants.gov/web/grants/applicants/registration.html>. Do we
- c. **Add a Profile to a Grants.gov Account:** A profile in Grants.gov corresponds to a single applicant organization the user represents (i.e., an applicant) or an individual applicant. If you work for or consult with multiple organizations and have a profile for each, you may log in to one Grants.gov account to access all of your grant applications. To add an organizational profile to your Grants.gov account, enter the UEI Number for the organization in the UEI field while adding a profile.

For more detailed instructions about creating a profile on Grants.gov, refer to:

<https://www.grants.gov/web/grants/applicants/registration/add-profile.html>.

- a. **Ebiz POC Authorized Profile Roles:** After you register with Grants.gov and create an Organization Applicant Profile, the applicant's request for Grants.gov roles and access is sent to the Ebiz POC. The Ebiz POC will then log in to Grants.gov and authorize the appropriate roles, which may include the AOR role, thereby giving you permission to complete and submit applications on behalf of the organization. You will be able to submit your application online any time after you have been assigned the AOR role.

For more detailed instructions about creating a profile on Grants.gov, refer to:

<https://www.grants.gov/web/grants/applicants/registration/authorize-roles.html>.

- b. **Track Role Status:** To track your role request, refer to:
<https://www.grants.gov/web/grants/applicants/registration/track-role-status.html>.
- c. **Electronic Signature:** When applications are submitted through Grants.gov, the name of the organization applicant with the AOR role that submitted the application is inserted into the signature line of the application, serving as the electronic signature. The Ebiz POC **must** authorize people who are able to make legally binding commitments on behalf of the organization as a user with the AOR role; **this step is often missed, and it is crucial for valid and timely submissions.**

7. How to Submit an Application to DHS via Grants.gov

Grants.gov applicants can apply online using Workspace. Workspace is a shared, online environment where members of a grant team may simultaneously access and edit different webforms within an application. For each NOFO, you can create individual instances of a Workspace.

Below is an overview of applying on Grants.gov. For access to complete instructions on how to apply for opportunities using Workspace, refer to:

<https://www.grants.gov/web/grants/applicants/workspace-overview.html>.

- a. **Create a Workspace:** Creating a workspace allows you to complete it online and route it through your organization for review before submitting.
- b. **Complete a Workspace:** Add participants to the workspace to work on the application together, complete all the required forms online or by downloading PDF versions, and check for errors before submission. The Workspace progress bar will display the state of your application process as you apply. As you apply using Workspace, you may click the blue question mark icon near the upper-right corner of each page to access context-sensitive help.
- c. **Adobe Reader:** If you decide not to apply by filling out webforms you can download individual PDF forms in Workspace. The individual PDF forms can be downloaded and saved to your local device storage, network drive(s), or external drives, then accessed through Adobe Reader.

NOTE: Visit the Adobe Software Compatibility page on Grants.gov to download the appropriate version of the software at: <https://www.grants.gov/web/grants/applicants/adobe-software-compatibility.html>.
- d. **Mandatory Fields in Forms:** In the forms, you will note fields marked with an asterisk and a different background color. These fields are mandatory fields that must be completed to successfully submit your application.
- e. **Complete SF-424 Fields First:** The forms are designed to fill in common required fields across other forms, such as the applicant's name, address, and UEI number. To trigger this feature, an applicant must complete the SF-424 information first. Once it is completed, the information will transfer to the other forms.
- f. **Submit a Workspace:** An application may be submitted through workspace by clicking the Sign and Submit button on the Manage Workspace page, under the Forms tab. Grants.gov recommends submitting your application package at least 24-48 hours prior to the close date to provide you with time to correct any potential technical issues that may disrupt the application submission.
- g. **Track a Workspace Submission:** After successfully submitting a workspace application, a Grants.gov Tracking Number (GRANTXXXXXXXX) is automatically assigned to the application. The number will be listed on the Confirmation page that is generated after submission. Using the tracking number, access the Track My Application page under the Applicants tab or the Details tab in the submitted workspace.

For additional training resources, including video tutorials, refer to:

<https://www.grants.gov/web/grants/applicants/applicant-training.html>.

Applicant Support: Grants.gov provides applicants 24/7 support via the toll-free number 1-800-518-4726 and email at support@grants.gov. For questions related to the specific grant opportunity, contact the number listed in the application package of the grant to which you are applying.

If you are experiencing difficulties with your submission, it is best to call the Grants.gov Support Center and get a ticket number. The Support Center ticket number will assist DHS with tracking your issue and understanding background information on the issue.

8. Timely Receipt Requirements and Proof of Timely Submission

Online Submission. All applications must be received by 11:59 PM Eastern time on the due date established for each program. Proof of timely submission is automatically recorded by Grants.gov. An electronic date/time stamp is generated within the system when the application is successfully received by Grants.gov. The applicant with the AOR role who submitted the application will receive an acknowledgement of receipt and a tracking number (GRANTXXXXXXXX) from Grants.gov with the successful transmission of their application. This applicant with the AOR role will also receive the official date/time stamp and Grants.gov Tracking number in an email serving as proof of their timely submission.

When DHS successfully retrieves the application from Grants.gov, and acknowledges the download of submissions, Grants.gov will provide an electronic acknowledgment of receipt of the application to the email address of the applicant with the AOR role who submitted the application. Again, proof of timely submission shall be the official date and time that Grants.gov receives your application. Applications received by Grants.gov after the established due date for the program will be considered late and will not be considered for funding by DHS.

Applicants using slow internet, such as dial-up connections, should be aware that transmission can take some time before Grants.gov receives your application. Again, Grants.gov will provide either an error or a successfully received transmission in the form of an email sent to the applicant with the AOR role attempting to submit the application. The Grants.gov Support Center reports that some applicants end the transmission because they think that nothing is occurring during the transmission process. Please be patient and give the system time to process the application.

9. Content and Form of Application Submission

See Appendices A and B for a list of required documents for this application, forms, and formats. No pre-applications or letters of intent are required to apply.

As discussed in the eligibility section of this NOFO, current awardees and sub-awardees under the FY 2023 Citizenship and Integration Grant Program (funding opportunities DHS-23-CIS-010-002 and DHS-23-CIS-010-003) are not eligible to receive funding under this funding opportunity.

10. Funding Restrictions and Allowable Costs

a. General Requirements

All costs charged to federal awards (including both federal funding and any non-federal matching or cost sharing funds) must comply with applicable statutes, rules and regulations, policies, this NOFO, and the terms and conditions of the federal award. They must also comply with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements at 2 C.F.R. Part 200 unless

otherwise indicated in the NOFO or the terms and conditions of the federal award. This includes, among other requirements, that costs must be incurred, and products and services must be delivered within the budget period. 2 C.F.R. § 200.403(h).

b. Funding Restrictions

Grant funds may **not** be used for the following purposes:

- 1) Cost-sharing or matching funds for other federal grants, lobbying, or intervention in federal regulatory or adjudicatory proceedings. In addition, federal funds may not be used to sue the federal government or any other government entity.
- 2) USCIS application fees.
- 3) Costs of organized fundraising, including financial campaigns, endowment drives, solicitation of gifts and bequests, and similar expenses incurred solely to raise capital or obtain contributions.
- 4) Profit/Fee is not allowable except when subcontracting for routine goods and services with commercial organizations.
- 5) Foreign travel.
- 6) Construction costs and purchase of real property under this funding opportunity.
- 7) Pre-award costs.
- 8) Funding for direct reimbursement of proposal development.
- 9) Costs for food or refreshments.
- 10) Incentive items or gift cards.
- 11) General volunteer stipends.
- 12) Living allowances for any national volunteer service program participants.
- 13) Fees for conferences that are not considered training events.

c. Allowable Costs

DHS grant funds may only be used for the purposes set forth in the agreement and must be consistent with the statutory authority for the award. Grant funds may be used for the following purposes:

- 1) Providing services to qualified LPRs only, regardless of race, color, religion, sex, or national origin.
- 2) Resources to support citizenship instruction, including staff salaries, textbooks/materials, CASAS Citizenship Assessment, software, etc.
- 3) Professional development and training for staff and/or volunteers related to the provision of citizenship instruction and/or naturalization application services.
- 4) Facility rental costs not to exceed more than 20% of the total approved budget.
- 5) Resources to support naturalization application services including staff salaries, case management systems, costs associated with DOJ recognition of organizations and accreditation (or renewal) of staff. This includes training costs related to DOJ recognition and accreditation.
 - a) Funding can be used to complete Form N-600.
 - b) Applicants may not count Forms N-600 as part of their number of N-400s filed. Applicants may account for these individuals served in the narrative portion of the quarterly performance report.
- 6) Transportation costs for students attending grant-funded classes.
 - a) Transportation funds provided to students must match the student's individual transportation costs.
 - b) Applicants must have a system to track how transportation funds are used.
- 7) Reimbursement of transportation costs for volunteers participating in grant-funded activities. Volunteers may not receive a general transportation stipend.
 - a) Transportation funds provided to volunteers must match the volunteers' individual transportation costs.

- b) Applicants must have a system to track how transportation funds are used.
- 8) Childcare costs to assist eligible participants to attend grant-funded classes.
- 9) Travel costs for one teacher or coordinator to attend a USCIS teacher training (or another professional development training with approval from USCIS).
- 10) Equipment purchases directly related to the provision of services.
- 11) Costs associated with the use of computers for citizenship instruction (e.g., computer equipment, internet access, electronic tablets, etc.).

d. Management and Administration (M&A) Costs

Management and Administration Costs are allowable for the grantee and any proposed sub-awardee (if applicable). For more information on allowable costs, please see Funding Restrictions (above).

e. Indirect (Facilities and Administrative (F&A)) Costs

Indirect Costs (IDC) are allowable by the recipient and subrecipients as described in 2 C.F.R. Part 200, including 2 C.F.R. § 200.414. Applicants with a current negotiated IDC rate agreement who desire to charge indirect costs to an award must provide a copy of their IDC rate agreement at the time of application. Not all applicants are required to have a current negotiated IDC rate agreement. Applicants that are not required to have a negotiated IDC rate agreement but are required to develop an indirect cost rate proposal must provide a copy of their proposal at the time of application. Applicants who do not have a current negotiated IDC rate agreement (including a provisional rate) and wish to charge the de minimis rate must reach out to the Program Office and the Grants Office for further instructions.

f. Evaluation Costs

Recipients and subrecipients are encouraged to incorporate program evaluation activities from the outset of their program design and implementation to meaningfully document and measure their progress towards the outcomes proposed. Title I of the Foundations for Evidence-Based Policymaking Act of 2018 (Evidence Act), Pub. L. No. 115-435 (2019) defines evaluation as “an assessment using systematic data collection and analysis of one or more programs, policies, and organizations intended to assess their effectiveness and efficiency.” Evidence Act § 101 (codified at 5 U.S.C. § 311). Credible program evaluation activities are implemented with relevance and utility, rigor, independence and objectivity, transparency, and ethics (OMB Circular A-11, Part 6 Section 290).

Evaluation costs are allowable costs (either as direct or indirect), unless prohibited by statute or regulation, and such costs may include the personnel and equipment needed for data infrastructure and expertise in data analysis, performance, and evaluation. (2 C.F.R. §200).

In addition, recipients are required to participate in a DHS-led evaluation if selected, which may be carried out by a third-party on behalf of the Program Office or DHS. By accepting grant funds, recipients agree to participate in the evaluation, which may include analysis of individuals who benefit from the grant, and provide access to program operating personnel and participants, as specified by the evaluator(s) for six months after the period of performance.

E. Application Review Information**1. Application Evaluation****a. Programmatic Criteria**

DHS will use the following criteria to evaluate applications deemed eligible and responsive. Applicants can receive up to 100 points.

1) Capacity and Need to Provide Comprehensive Citizenship Instruction (15 Points)

The extent to which the applicant demonstrates:

- Experience providing citizenship instruction (a minimum of 1 year of experience within the past 3 years is required) (5 points);
- Experience providing ESL instruction (for a minimum of 1 year experience within the past 3 years is required) (5 points); and
- The need for citizenship instruction within the immigrant community that the applicant serves (5 points).

2) Quality of the Proposed Citizenship Instruction Program (30 points)

The extent to which the applicant proposes a high-quality citizenship instruction program to meet the citizenship education needs of the community, including:

- Attainable citizenship instruction program goals (2 points);
- Detailed outreach, orientation, intake, and student retention plans (6 points);
- Plans to use a CASAS Citizenship Assessment for pre and post-testing of citizenship students (2 points);
- Well-developed and appropriate curriculum and class structure, including the use of managed enrollment, integration activities, and textbooks for all students (10 points); and
- Qualified and experienced instructors (as described in the project narrative requirements) (10 points)⁶.

3) Capacity and Need to Provide Comprehensive Naturalization Application Services (15 points)

The extent to which the applicant demonstrates:

- Recent experience preparing and filing Forms N-400 and G-28 for qualified LPRs within the authorized practice of immigration law⁷ (10 points); and
- The need for naturalization application services within the immigrant community that the applicant serves (5 points).

4) Quality of the Proposed Naturalization Application Services Program (30 points)

The extent to which the applicant proposes a high-quality naturalization application services program, including:

⁶ Please see USCIS' Professional Development Guide for Adult Citizenship Educators for competencies USCIS would expect qualified and experienced personnel to demonstrate in the citizenship instruction classroom. Programs whose instructors 1) hold a degree in TESOL; and/or 2) hold TESOL certifications from a state licensing agency; and/or 3) have a minimum of two years of experience in TESOL instruction in a classroom setting for a program that utilizes a textbook and a structured curriculum are more likely to receive funding.

⁷ DHS requires that all applicants demonstrate experience providing naturalization application services within the authorized practice of immigration law. Applications that fail to demonstrate this experience will not be scored on criteria 3 and 4 and, as a result, will be deemed ineligible.

- Attainable naturalization application services program goals (4 points);
- Detailed outreach and intake plans (4 points);
- High-quality service delivery and case management (10 points); and
- Qualified and experienced legal service provider(s) (as described in the project narrative requirements) (12 points).

5) Cost and Program Effectiveness and Balance (10 points)

The extent to which the applicant:

- Demonstrates a plan to provide cross-referral citizenship preparation services (a well-defined cross-referral plan is required that ensures priority access for enrolled students seeking legal services and for legal applicants interested in citizenship instruction) (2 points);
- Proposed budget is tied to the delivery of programmatic services and demonstrates a balance between funding dedicated to citizenship instruction and naturalization application services (4 points);
- Proposed budget includes funding for student textbooks, pre-and post-tests, site visits to subrecipients (if applicable), staff travel to USCIS interviews, and all other items required to effectively offer a high-quality citizenship preparation program (2 points);
- Proposed budget includes strategies used to address barriers to effectiveness (e.g., transportation, bus passes, tutoring, childcare) (2 points).

b. Financial Integrity Criteria

Prior to making a federal award, the DHS GFAD is required by 31 U.S.C. §3321 note, 41 U.S.C. §2313, and 2 C.F.R. §200.205 to review information available through any OMB-designated repositories of government wide eligibility qualification or financial integrity information.

Therefore, application evaluation criteria may include the following risk-based considerations of the applicant:

- 1) Financial stability;
- 2) Quality of management systems and ability to meet management standards;
- 3) History of performance in managing federal award;
- 4) Reports and findings from audits;
- 5) Ability to effectively implement statutory, regulatory, or other requirements.

c. Supplemental Financial Integrity Criteria and Review

Prior to making a federal award where the anticipated total federal share will be greater than the simplified acquisition threshold, currently \$XXX,XXX (see Section 805 of the National Defense Authorization Act for Fiscal Year 2018, Pub. L. No. 115-91, OMB Memorandum M-18-18 at <https://www.whitehouse.gov/wp-content/uploads/2018/06/M-18-18.pdf>):

- 1) DHS GFAD is required to review and consider any information about the applicant that is in the designated integrity and performance system accessible through SAM, which is currently the [Federal Awardee Performance and Integrity Information System](#) (FAPIIS) and is accessible through the sam.gov website.
- 2) An applicant, at its option, may review information in FAPIIS and comment on any information about itself that a federal awarding agency previously entered.
- 3) DHS GFAD will consider any comments by the applicant, in addition to the other information in FAPIIS, in making a judgment about the applicant's integrity, business ethics, and record of performance under federal awards when completing the review of risk posed by applicants as described in 2 C.F.R. §200.206.

2. Review and Selection Process

DHS will conduct an initial review of applications to determine the responsiveness of the application. If an applicant is determined to be ineligible (see section C. Eligibility Information) or an application is determined to be non-responsive, DHS will notify the applicant. All responsive and eligible applications will be reviewed as described below:

- a. DHS will assemble reviewers which may include both federal and non-federal reviewers to review the eligible applications. Reviews of submitted applications will be conducted by remote review.
- b. Teams of technical reviewers will review each eligible application against the evaluation criteria. The reviewers will assign a score and provide summary comments based on the evaluation criteria identified above.
- c. An application may be selected for post-review quality control and possible rescoring if it received significantly diverging scores and comments from reviewers.
- d. An internal review panel consisting of DHS staff will review the highest ranked applications and make final funding recommendations. The internal review panel may take applications out of rank order in consideration of strategic program priorities, which are identified below.
- e. DHS may perform an additional review of the applicant organization and any sub- awardees and/or its key personnel. This may include reviewing audit reports, publicly available materials, and/or government data which may have a bearing on award outcome. DHS may request additional materials from the applicant as part of this review, including:
 - 1) The summary letter from the applicant's most recent audit report;
 - 2) Documentation of previous grant award completion that includes the name of the grantor, amount awarded, and whether the grant recipient sufficiently completed the requirements of the grant award (e.g., a final close-out report, certification of grant award completion, etc.);
 - 3) A pre-award site visit or investigation to determine and validate current services and proposed activities; and
 - 4) A site visit conducted in the case of a contingent award to evaluate the organization's ability to satisfy the programmatic and administrative requirements of the grant. DHS reserves the right to not pursue the completion of the award process if preliminary investigations and/or site visits do not provide sufficient evidence of organizational capacity to successfully administer the proposed grant.
- f. After the technical review and before making final funding decisions, DHS may contact the highest-ranking applicants to seek clarification and to negotiate technical and programmatic aspects of the application. This may include negotiations on the curriculum content, staffing, budget, and activities. If an application includes a proposed subrecipient that will provide additional or complementary direct grant-funded services in partnership with the main applicant, DHS may request to speak with all parties included in the application to ensure sufficient planning and coordination has taken place prior to making an award.
- g. Confidentiality and Conflict of Interest. Technical and cost proposals submitted under this NOFO will be protected from unauthorized disclosure in accordance with applicable laws and regulations. DHS may use one or more support contractors in the logistical processing of proposals; however, funding recommendations and final award decisions are solely the responsibility of DHS personnel.

DHS screens all technical reviewers for potential conflicts of interest. To determine possible conflicts of interest, DHS requires potential reviewers to complete and sign conflict of interest and nondisclosure forms. DHS will keep the names of submitting institutions and individuals as well as the substance of the applications confidential except to reviewers and DHS staff involved in the award process. DHS will destroy any unsuccessful applications after three years following the funding decision.

- h. DHS strongly discourages, and will not consider, any supplementary materials submitted by or on behalf of the applicant (e.g., letters of support) other than those materials specifically requested in this NOFO.
- i. DHS will notify all applicants electronically of funding decisions.
- j. Strategic Program Priorities: Based on the recommendations of the Internal Review Panel, DHS may consider the following factors when making an award:

1.) Program Balance Factors, including (in descending order of importance):

- a) Whether an application shows prioritization for remote, underserved, isolated and/or rural populations (e.g., populations that have historically not benefitted from USCIS funding);
- b) Whether an application, when balanced with other potential awards and with existing Citizenship and Integration Grant Program recipients, represents a diverse geographic area;
- c) Whether an application, when balanced with other potential awards and existing Citizenship and Integration Grant Program recipients, represents a diverse population to be served; and
- d) Whether an application, when balanced against other potential awards with similar scores, incorporates use of technology in the citizenship instruction program that would help immigrant students gain sufficient digital literacy skills to navigate USCIS' educational resources and online application system.

2.) Past performance of a previous Citizenship and Integration Grant Program recipient (if applicable), including:

- a) Whether a previous grant recipient achieved their core program goals;
- b) Whether a previous grant recipient had major findings during a monitoring visit and failed to resolve them in the prescribed time period;
- c) Whether a previous grant recipient was placed on restricted drawdown status for cause, and if so, whether they were able to meet the conditions to have this restriction removed;
- d) Whether a previous grant recipient demonstrated an ability to file accurate and timely quarterly performance reports.

F. Federal Award Administration Information

1. Notice of Award

Notice of award will be sent by DHS to the awardee's Authorized Organization Representative (AOR). Before accepting the award, the AOR and recipient should carefully read the award package. The award package includes instructions on administering the grant award and the terms and conditions associated with responsibilities under federal awards. By submitting an application, applicants agree to comply with the requirements of this NOFO and the terms and conditions of the award, should they receive an award.

A grant award will be executed by a DHS Grants Officer authorized to obligate DHS funding. Organizations that are being funded for the first time under this grant program will be placed on

restricted drawdown until quarterly performance goals are met. Unsuccessful applicants will be contacted as well and will be encouraged to apply for future grant award programs. Announcements for future grant opportunities will be listed on [Grants.gov](https://www.grants.gov).

2. Administrative and National Policy Requirements

a. DHS Standard Terms and Conditions

All successful applicants for DHS grant and cooperative agreements are required to comply with [DHS Standard Terms and Conditions](#), which are available online at: DHS Standard Terms and Conditions. In addition, awardees are required to comply with the prohibitions on certain telecommunications equipment and services under Section 889 of the [John. S. McCain National Defense Authorization Act](#) (NDAA) for Fiscal Year (FY) 2019.

Post-award program income: In the event program income becomes available to the recipient post-award, it is the recipient's responsibility to notify the DHS Grants Officer to explain how that development occurred, as part of their request for guidance and/or approval. The Grants Officer will review approval requests for program income on a case-by-case basis; approval is not automatic. Consistent with the policy and processes outlined in 2 C.F.R. Part 200, pertinent guidance and options, as determined by the type of recipient and circumstances involved, may be approved by the Grants Officer. If approval is granted, an award modification will be issued with an explanatory note in the remarks section of the face page concerning guidance and/or options pertaining to the recipient's approved request. All instances of program income must be listed in the progress and financial reports.

The applicable DHS Standard Terms and Conditions will be those in effect at the time the award was made unless the application is for a continuation award. In that event, the terms and conditions in effect at the time the original award was made will generally apply. What terms and conditions will apply for the award will be clearly stated in the award package at the time of award.

3. Reporting

a. Federal Financial Reporting (FFR) Requirements

The recipient must submit a Form SF-425, Federal Financial Report (FFR), to the DHS Grants Officer no later than 30 days after the end of the reporting period end date. The FFR is available online at <https://www.grants.gov/web/grants/forms/post-award-reporting-forms.html>. The FFR shall be submitted via GrantSolutions using the guidance found here: www.grantsolutions.gov/support/public/pdf/FederalFinancialReport-RecipientsFinalv2.pdf.

The Federal Financial Report (FFR) form is available online at: [SF-425 OMB #4040-0014](#) *Can'*

b. Programmatic Performance Reporting Requirements

The recipient is required to submit quarterly performance reports to the USCIS Program Office and the DHS Grants Officer within 30 days after the end of each quarter. Reports are due January 30, April 30, July 30, and October 30. Reports must be submitted via the USCIS Grantbook platform and GrantSolutions.gov using the guidance found here:

<https://www.grantsolutions.gov/support/pdf/GrantRecipientProcessPerformanceProgressReport.pdf>

Grant recipients must collect and report data on each program participant served with grant funding, which may include:

- 1) Alien registration numbers. USCIS may use these numbers to track naturalization outcomes during and after the period of performance;
- 2) Class of admission for program participants;
- 3) Countries of birth;
- 4) When specific services were provided, including:
 - Dates participants were enrolled in citizenship courses;
 - Dates classes are held;
 - Dates pre- and post- tests were conducted, and scores achieved;
 - Classes attended, including the number of hours in class;
 - Dates naturalization eligibility screenings were conducted; and
 - Dates Forms N-400 and G-28 were filed.
- 5) Assessment data, including pre- and post-test scores;
- 6) Class proficiency levels;
- 7) Names of instructors(s) teaching each class;
- 8) Changes to key grant-funded personnel (this must be pre-approved by the program officer)
- 9) Number of instructional hours provided per class;
- 10) Number of students enrolled per class;
- 11) Number of N-400s filed by the grant organization to USCIS. Note, N-600s shall not be counted towards the number of N-400s filed.

In addition to collecting these data, grant recipients must also provide quarterly narrative reports. The narrative report may include questions on the following topics: program accomplishments, progress meeting goals, progress of the subrecipient organization (if applicable), challenges in meeting goals, staff and/or organizational development activities, student assessment and progress, outreach activities, volunteer recruitment and training, staff changes, progress made toward DOJ accreditation, and promising practices.

These data are used to measure and track grantee performance and assess the success of individual programs as well as the collective performance of all grantees. All grantee performance data can be used to determine continued and future USCIS grant funding.

c. Closeout Reporting Requirements

Within 120 days after the end of the period of performance, or after an amendment has been issued to close out a grant, recipients must submit the following:

- 1) The final request for payment, if applicable;
- 2) The final FFR (SF-425);
- 3) The final progress report detailing all accomplishments;
- 4) A qualitative narrative summary of the impact of those accomplishments throughout the period of performance; and
- 5) Other documents required by this NOFO, terms and conditions of the award, or other DHS FAO guidance.

After these reports have been reviewed and approved by the DHS Financial Assistance Office, a closeout notice will be completed to close out the grant. The notice will indicate the period of performance as closed, list any remaining funds that will be de-obligated, and address the requirement of maintaining the grant records for three years from the date of the final FFR, unless a longer period applies, such as due to an audit or litigation, for equipment or real property used beyond the period of performance, or due to other circumstances outlined in 2 C.F.R. §200.334, Retention Requirements for Records.

In addition, any recipient that issues subawards to any subrecipient is responsible for closing out those subawards as described in 2 C.F.R. § 200.344, Closeout. Recipients acting as pass-through entities must ensure that they complete the closeout of their subawards in time to submit all necessary documentation and information to DHS FAO during the closeout of their prime grant award.

The recipient is responsible for returning any funds that have been drawn down but remain as unliquidated on recipient financial records.

d. Disclosing Information per 2 C.F.R. § 180.335

This reporting requirement pertains to disclosing information related to government-wide suspension and debarment requirements. Before a recipient enters into a grant award with DHS GFAD, the recipient must notify DHS GFAD if it knows if it or any of the recipient's principals under the award fall under one or more of the four criteria listed at 2 C.F.R. § 180.335:

- 1) Are presently excluded or disqualified;
- 2) Have been convicted within the preceding three years of any of the offenses listed in 2 C.F.R. § 180.800(a) or had a civil judgment rendered against it or any of the recipient's principals for one of those offenses within that time period;
- 3) Are presently indicted for or otherwise criminally or civilly charged by a governmental entity (federal, state, or local) with commission of any of the offenses listed in 2 C.F.R. § 180.800(a); or
- 4) Have had one or more public transactions (federal, state, or local) terminated within the preceding three years for cause or default.

At any time after accepting the award, if the recipient learns that it or any of its principals falls under one or more of the criteria listed at 2 C.F.R. § 180.335, the recipient must provide immediate written notice to DHS GFAD in accordance with 2 C.F.R. § 180.350.

e. Reporting of Matters Related to Recipient Integrity and Performance

Per 2 C.F.R. Part 200, Appendix I § F.3, the additional post-award reporting requirements in 2 C.F.R. Part 200, Appendix XII may apply to applicants who, if upon becoming recipients, have a total value of currently active grants, cooperative agreements, and procurement contracts from all federal awarding agencies that exceeds \$10,000,000 for any period of time during the period of performance of an award under this funding opportunity. Recipients that meet these criteria must maintain current information reported in FAPIIS about civil, criminal, or administrative proceedings described in paragraph 2 of Appendix XII at the reporting frequency described in paragraph 4 of Appendix XII.

Single Audit Report

A recipient that expends \$750,000 or more during the recipient's fiscal year in federal awards (as defined by 2 C.F.R. § 200.1) must have a single audit conducted in accordance with 2 C.F.R. § 200.514 except when it elects to have a program-specific audit conducted in accordance with 2 C.F.R. § 200.501. The audit must be conducted in accordance with 2 C.F.R. Part 200, Subpart F and, as required by 2 C.F.R. § 200.514, in accordance with the U.S. Government Accountability Office (GAO) Generally Accepted Government Auditing Standards, which can be found on the Yellow Book page of the GAO website.

3. Monitoring and Oversight

Per 2 C.F.R. §200.329, DHS GFAD, through its authorized representatives, has the right, at all reasonable times, to conduct desk reviews, make site visits to review project accomplishments and management control systems to review project accomplishments and to provide any required technical assistance. During site visits or desk reviews, DHS GFAD will review grant recipients' files related to the grant award. As part of any monitoring and program evaluation activities, grant recipients must permit DHS GFAD, upon reasonable notice, to review grant-related records and to interview the organization's staff and contractors regarding the program. Recipients must respond in a timely and accurate manner to DHS GFAD requests for information relating to the grant program.

If the monitoring visit results in a determination that basic, minimum requirements as outlined in the Notice of Funding Opportunity are not being met, DHS may require corrective actions and/or initiate termination of the award.

4. Program Evaluation

Recipients and subrecipients are encouraged to incorporate program evaluation activities from the outset of their program design and implementation to meaningfully document and measure their progress towards the outcomes proposed. Title I of the Foundations for Evidence-Based Policymaking Act of 2018 ([Evidence Act](#)), Pub. L. No. 115-435 (2019) defines evaluation as "an assessment using systematic data collection and analysis of one or more programs, policies, and organizations intended to assess their effectiveness and efficiency." Evidence Act § 101 (codified at 5 U.S.C. § 311). Credible program evaluation activities are implemented with relevance and utility, rigor, independence and objectivity, transparency, and ethics (OMB Circular A-11, Part 6 Section 290).

Evaluation costs are allowable costs (either as direct or indirect), unless prohibited by statute or regulation, and such costs may include the personnel and equipment needed for data infrastructure and expertise in data analysis, performance, and evaluation. (2 C.F.R. §200).

In addition, recipients are required to participate in a DHS-led evaluation if selected, which may be carried out by a third-party on behalf of the Program Office or DHS. By accepting grant funds, recipients agree to participate in the evaluation, which may include analysis of individuals who benefit from the grant, and provide access to program operating personnel and participants, as specified by the evaluator(s) for six months after the period of performance.

G. DHS Awarding Agency Contact Information

1. Contact and Resource Information

USCIS Program Office (Office of Citizenship):

Send all questions to citizenshipgrantprogram@uscis.dhs.gov.

USCIS Office of Citizenship staff will respond within five business days

DHS Grants Office: Send all questions to the Grants Officer at CISMailbox@hq.dhs.gov.

2. Systems Information

For technical assistance with Grants.gov, call the customer support hotline 24 hours per day, 7 days per week (except federal holidays) at (800) 518-4726 or e-mail at support@grants.gov.

H. Other Information

Applicants can obtain NOFO overviews and announcement information from Grants.gov where the full NOFO is posted. Applications will be processed through the Grants.gov portal.

1. Period of Performance Extensions

Grantees may request a no-cost extension to complete all project activities. The request must be submitted 45 days prior to the expiration of the performance period. Grantee requests for extension will be evaluated based on performance to date and potential for meeting programmatic requirements within the proposed extension period. Requests for extensions are subject to approval by the DHS Grants and Financial Assistance Grants Officer.

2. Appendices

For information on additional required documents, and the format of the narrative application please see Appendix A. Appendix B provides a checklist of documents to submit with each application. Appendix C contains list of USCIS citizenship education resources. For definitions of frequently used terms in this NOFO, see the FY 2023 Glossary in Appendix D.

APPENDIX A: ADDITIONAL REQUIRED FORMS

Complete the required forms in accordance with the application instructions on Grants.gov. If submitting any information that is deemed proprietary, privileged or confidential, commercial or financial, please denote the beginning and ending of such information with asterisks (***)

1. Form SF-424 – Application for Federal Assistance

This form must be completed within the application package on Grants.gov. You must download and install Adobe Reader to view this form. Applicants are only required to complete fields which are highlighted.

2. Form SF-424A – Budget

This form must be completed within the application package on Grants.gov. You must download and install Adobe Reader to view this form. Applicants are only required to complete fields which are highlighted.

Provide budget amounts by object class (personnel, fringe benefits, travel, etc.). Include second year budget amounts in Section E. Funds may be requested if the item and amount are necessary to perform the proposed work and are not precluded by the cost principles or program funding restrictions.

3. Certifications/Assurances

These forms must be completed within the application package on Grants.gov. You must download and install Adobe Reader to view these forms. Applicants must submit:

a. Form SF-424B – Assurances – Non-Construction Programs; and

b. Certification Regarding Lobbying. If paragraph two of the certification applies, then complete and submit SF-LLL Disclosure of Lobbying which is provided as an optional form in the application package.

By signing and submitting an application under this announcement, the applicant is providing: Certification Regarding Drug-Free Workplace Requirements; Certification Regarding Debarment, Suspension, and Other Responsibility Matters – Primary Covered Transactions; and Certification that the applicant is not delinquent on any federal debt.

4. Project Abstract (5 pages maximum)

Provide the information requested below. Please address each question in the order outlined in the table below. The project abstract must not include any proprietary or confidential information. Attach the Project Abstract to the application package.⁸

⁸ See the Grants.gov [Applicant User Guide](#) for instructions on how to attach forms and documents.

Appendix A: Additional Required Documents

General Information		
<i>Complete the following table.</i>		
1	Organization legal name	
2	Organization legal address (Number and street, city, state, zip code)	
3	Head of the organization (Name, title, address, phone number, email address)	
4	Authorized Organization Representative (AOR), the person at the organization authorized to sign and receive award (Name, title, address, phone number, email address and website)	
5	Grant Project Manager, the person who will manage operations of the grant project and will serve as USCIS' primary point of contact (Name, title, address, phone number, email address)	
6	Type of organization (e.g., community/faith-based organization, public school, adult education program, public library)	
7	Total numbers organization is proposing to serve with this grant: <ul style="list-style-type: none"> • Students enrolled; • Form N-400 screenings; • Form N-400's filed 	
8	Annual Organizational Budget	
9	Total federal funding requested (up to \$300,000)	
10	Total federal funding allocated for citizenship instructor salaries	
11	Total federal funding allocated for administrative costs	
12	Total cost share (percentage of total award amount requested; minimum of 10% required)	
13	Geographic area/community where services will be provided	

14	Congressional district (the legal address of the applicant organization)	
15	Congressional district (where services will be provided)	
16	Number of full-time equivalents (FTEs). Indicate the number of intended grant-funded FTEs.	
17	Fees charged for citizenship instruction (if applicable)	
18	Fees charged for naturalization application services (if applicable)	
19	Is your organization or proposed subrecipient DOJ recognized? (yes/no)	
20	List all employees who are DOJ Accredited or attorneys who will work on this grant	
21	List any grants received by the applicant in the past three years focused on adult education or services to immigrants. Include: <ul style="list-style-type: none"> • Awarding agency • Date received • Dollar amount 	
Proposed Subrecipient Organization(s) (if applicable) <i>If there are multiple subrecipients, provide the below information for each.</i>		
22	Subrecipient organization legal name	
23	Subrecipient organization point of contact (Name, title, address, phone number and email address)	
24	Is the subrecipient a non-profit or public organization? If not, the subrecipient is not eligible to receive funding	
25	Subrecipient type of organization (e.g., community/faith-based organization, public school, adult education program, public library, etc.)	
26	Services proposed by subrecipient organization (legal services, education services, or both)	

27	Total federal funds allocated for the subrecipient	
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5. Project Narrative (16 double-spaced page maximum)

In a separate document, provide a response for each item in the chart below following the order listed. **The items and attachments listed in each section below are required.** Any item or attachment that is omitted will result in a points deduction.

Format Requirements

- Include the title “Project Narrative” at the top of the first page.
- Ensure that the application can be printed on 8 ½” x 11” single-sided paper.
- Use double line spacing.
- Font size must be at least 12 point, preferably Times New Roman font.
- Margins must be at least one (1) inch at the top, bottom, left and right of the paper.
- Project narrative pages must be numbered “1” of “XX.”
- Pages should be numbered consecutively and are limited to a total of **16 pages**.
- Do not include any marks from the “Track Changes” tool in your word processing program.
- Attach the completed Project Narrative to the application package.

Project Narrative Items
A. Citizenship Instruction Program
1. Capacity to Provide Citizenship Instruction

- The applicants recent **experience providing ESL instruction** (the description must distinguish if it is the applicant or proposed subrecipient's experience). Include:
 - Dates and total years of experience providing ESL instruction;
 - The number of students enrolled in ESL classes in the past year and any previous years;
 - Name of the standardized test of English language proficiency used;
 - Experience administering a standardized test(s);
 - The program's pre- and post-test rates for the last program cycle, if applicable, as well as the percentage of ESL students that demonstrated educational gains in that same program cycle.
- The applicant's (or proposed subrecipient's) recent **experience providing citizenship instruction**. Include the following:
 - Dates and total years of experience providing citizenship instruction;
 - The number of students enrolled in citizenship instruction in the past year and any previous years;
 - If available, the naturalization test pass rate for program participants; and
 - The textbook and other resources used.
- The particular LPR **population(s) that the applicant currently serves** with citizenship and ESL instruction.
- **The need for citizenship instruction among the LPR population**, including whether there are wait lists for citizenship instruction and/or ESL instruction at the applicant's organization. Indicate whether there are other citizenship and ESL instruction service providers in the area.

2. Proposed Goals for Enrollment, Testing, and Educational Gains

- Explain how the proposed number of students to be served under the grant-funded program is attainable based on your organization's experience, past performance, and the proposed budget.
- Explain how the proposed goals for 1) the percentage of students to be pre- and post-tested and 2) the percentage of students demonstrating educational gains are feasible based on your organization's experience, past performance, and proposed budget.
- Describe the retention strategies employed or that will be employed to maintain a satisfactory post-test rate. Describe the strategies employed or that will be employed to assist students who are not making educational gains.
- Indicate how many additional students will be served under the grant-funded program that would otherwise not be served.

3. Program Administration

- The outreach plan to raise awareness of program services and recruit students.
- The intake procedures, including how the organization will verify and document that only LPRs will receive services funded through this funding opportunity.
- The orientation process for new students.
- The strategies you use to address barriers to student attendance (e.g., transportation, childcare, tuition and fees, etc.), and your organization's attendance policy.
- The proposed managed enrollment policy for the program, including whether students will be permitted to enroll in grant-funded classes after the start of a class cycle (and if so, the enrollment cut-off period). Include how the organization will accommodate students who desire to attend classes after the registration period has closed.
Note: Programs may not enroll students after the third class.
- The proposed plan for pivoting to virtual or hybrid services.
- Organizations may charge a fee for enrollment or materials of \$50 or less. Organizations may use this fee as a deposit that may be refunded at the end of the course. Note that any fees collected and not returned to students are considered program income and would need to be re-invested into the program.

4. Class and Management Structure

- A description of the nationally normed standardized test will be used for the program to assess knowledge acquisition. Please also describe when the tests will be administered, who will conduct the tests, and how they will be trained to administer the tests.
- Complete the table below with information from the classes you are proposing for this grant. We have provided sample information as a guide.

Name of Class	Location	Days, Times	Length/Total Instructional Hours	Textbook	Instructor's Name
High Beginning	Main campus Building A	Mondays and Wednesdays 6:00-8:00	10 weeks each quarter/40 hours	Citizenship Tomorrow-Acme Publishing 2019 27 th edition	Jill Brown

- Provide a separate document as an attachment to the proposal summarizing your proposed grant-funded citizenship program.¹⁰ This document will not count towards your project narrative page limit and must include:
 - A course outline or syllabus. Do not attach copies of books or USCIS materials;
 - Course learning objectives (for each course); and Textbook(s) and supplemental materials to be used.

¹⁰ For guidance on developing a citizenship curriculum, please review the [USCIS Guide to Creating an Adult Citizenship Education Curriculum](#)

5. Virtual Classes (if applicable)

Applicants should describe the following:

- Provide a description of student population to be served virtually;
- Best practices which will be incorporated into a virtual setting;
- Outreach plan for virtual classes.

6. Personnel

- Using the below sample staff table as a template, please provide information on citizenship instruction program staff. Please also provide resumes for each staff member included in the chart.

Sample Staff Table				
Name	Title and Position Description	Paid or Volunteer	FTE Charged to Grant	Relevant experience, qualifications, and training
Jill Brown	Education Program Coordinator – manages adult education programs	Paid	0.5 FTE	TESOL degree, 5 years of experience as a program manager, 10 years of experience teaching ESL

- If applicable, explain how **volunteers** will be used for the citizenship instruction program. Describe their roles and responsibilities, the training they will receive, and the reporting structure. Volunteers must be managed by a paid lead instructor or a paid education program coordinator.
- If your organization only has one instructor on staff at the time of application, please describe your organization's **contingency plan** for the provision of citizenship instruction in the event of staff turnover.
- Any changes to key personnel must be pre-approved by the program officer.

B. Naturalization Application Services Program**1. Capacity to Provide Naturalization Application Services**

- The naturalization application services provider's **recent experience providing naturalization application services within the authorized practice of immigration law.** Include:
 - Dates and total years of experience preparing and filing Forms N-400 and G-28;
 - Whether the services were provided by attorneys or by DOJ accredited representatives; and
 - The number of LPRs served in the past year and any previous years.
- **Program achievements**, including the organization's record of filing successful naturalization applications.
- The **particular LPR population(s) that the applicant serves** with naturalization application services.
- The **need for naturalization application services** among the LPR population served, including whether there are wait lists for services. Indicate whether there are other naturalization application service providers in the area.

2. Attainable Naturalization Application Services Goals

- Explain how the proposed number of naturalization participants to be served under the grant-funded program is feasible based on your organization's experience, past performance, and the proposed budget.
- Indicate how many naturalization applications you intend to file in the next two years with this grant funding that otherwise would not have been filed. Please reference your program goals table attachment.

3. Program Administration

- The coordinated **outreach plan** to raise awareness of services and recruit participants.
- **The intake procedures**, including how the organization and subrecipients (if applicable) will verify and document that only LPRs will receive services funded through this funding opportunity, and who will conduct intake and assess client eligibility.
- The proposed plan for pivoting to virtual or hybrid services.
- A nominal fee of \$75 or less may be charged for legal services. Organizations may not charge different fees to LPRs based on case complexity.

4. Case Management

- The naturalization application services provided, including the forms filed on behalf of clients.
- The naturalization eligibility screening process and who will determine clients' eligibility for naturalization.
- How your organization handles complex cases.
- The support provided to clients throughout the application process (e.g., from intake until the oath ceremony).
- How your organization prepares clients for the naturalization interview.
- How your organization keeps clients informed of their case status.
- Any plans to use grant funds to hold group application workshops, and if so, the process for following up with those clients about their cases.

5. Virtual Services (if applicable)

If the Applicant will be providing virtual services, the applicant must:

- Describe the population to be served virtually;
- Provide a detailed outreach plan;
- Describe how it will virtually verify identity and LPR status;
- How it will collect digital signatures from LPRs.

6. Personnel

- The **staffing structure** for the proposed naturalization application services program.
 1. Provide a list of key personnel for the program. Key personnel include the project manager(s), the DOJ accredited representative(s) and/or attorney(s), and any additional case workers. Provide resumes for each listed staff member.
 2. For each person, provide the following information, preferably in a table format:
 - a) Name, or indicate if the position is vacant. If the position is vacant, provide a separate position description and target start date;
 - b) Title and brief position description;
 - c) Whether the position is paid or volunteer;
 - d) FTE charged to the grant;
 - e) Relevant experience, qualifications, and training. For the DOJ accredited representative(s) and/or attorney(s), indicate the level of experience providing naturalization application services; and
 - f) Indicate who will sign Form N-400 as the preparer and who will sign the Form G-28 in connection with all naturalization applications filed under this grant.
 - g) Changes to key personnel must be pre-approved by the USCIS Program Office.
 - h) See below for a sample staff table.

Sample Staff Table				
Name	Title and Position Description	Paid or Volunteer	FTE charged to grant	Relevant experience, qualifications, and training
Jim Smith	DOJ accredited representative – provides immigration legal services to clients	Paid	0.3 FTE	Accredited for 5 years, 3 years of experience with naturalization application services

- If your organization has only one staff member that is DOJ accredited or an attorney, please describe your organization's **contingency plan** for the provision of naturalization application services in the event of staff turnover. You may use grant funds to cover costs associated with the DOJ accreditation of additional staff members.
- If applicable, explain **how volunteers will be used** for the naturalization application services program. Describe their qualifications, roles and responsibilities, the training they will receive, and the reporting structure.

- Plans for a **coordinated data collection system**, including how the organization and subrecipient (if applicable) will track and report on services provided and whether students and clients naturalize. Explain the system used for tracking data.
- If a **subrecipient** is proposed, describe the applicant's history working with the subrecipient organization. Describe the applicant's plan for managing the subrecipient's performance and maintaining frequent communication with the subrecipient.

6. Project Narrative Attachments

NOTE: The attachments will not count toward the page limit for the Project Narrative. These items should be attached to the application package.

- Attach résumés and/or position descriptions (if the position is vacant) for all key personnel, including program managers and coordinators, instructors (paid and volunteer), attorneys and/or DOJ accredited representatives, and other legal support staff. Résumés must include all relevant job experience, education, and licensure or accreditation with corresponding dates.
- Organizational chart** for the applicant and any proposed subrecipient(s).
- If you propose a subrecipient, the applicant must include a signed **Memorandum of Understanding (MOU)** between the organizations as a required attachment to the grant application. The MOU should include the responsibilities expected of each party, performance expectations, plans for maintaining communication, and the payment and/or reimbursement process for the subrecipient(s). The MOU should be signed by both parties and dated.

7. Program Goals

Provide the following goals for grant-funded services in a table format. Include the total number over the 2-year period, as well as a breakdown by quarter. There are 8 quarters over the 2-year performance period and each quarter is 3 months long.

Goal	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Total
1. Number of newly enrolled (non-duplicated) LPRs to enroll in citizenship instruction classes									
2. Percentage of enrolled students who post-test (Minimum 80%)									
3. Percentage of post-tested students demonstrating measurable educational gains (Minimum 80%)									

4. Number of LPRs for whom your organization will provide naturalization eligibility screenings									
5. Number of LPRs for whom your organization will prepare and file Form N-400 and Form G-28									

8. Budget Table and Narrative

When proposing costs for this grant program, ensure that the budget shows a reasonable balance of costs between the citizenship instruction program and the naturalization application services program.

If a **subrecipient** is proposed, applicants must provide a separate subrecipient budget narrative and table following the same format and with the same level of detail as that of the applicant (that is, by Object Class Category/Cost Classification). Each subrecipient budget and supporting detail should be separate from the applicant's budget narrative.

If any fees are proposed that will result in program income, show in the budget how this income will be used to support the program.

Budget Table

Provide your budget request in a table format in addition to the budget narrative. Include all budget categories, as listed in the budget narrative section. Under each category list the line items requested. See sample table below. Note: This sample table shows the Personnel category only. Applicants must provide information on all budget categories.

	Year 1			Year 2			Total		
Category and Item	In-Kind	DHS	Total	In-kind	DHS	Total	In-kind	DHS	Total
1. Personnel									
J. Smith, Program Manager – 1 FTE	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X
B. Diaz, Instructor – 0.5 FTE	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X
L. Santiago, Attorney – 1 FTE	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X
K. Brown, Assistant – 0.25 FTE	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X
TOTAL Personnel	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X	\$X

The Budget Table may be provided either in the same document as the budget narrative or attached to the application package.

Budget Narrative (Five-page limit)

Attach your budget narrative (including separate budget narratives for each proposed subrecipient) to the application package. Please limit the information provided in this section to budget relevant information only.

Include costs for the first and second performance years. Separate the first performance year costs from the second performance year costs. Show a total of all requested federal grant funds. This total should match the total listed on the project abstract. Budget categories **b – h** below should add up to this total. This total should **not** include any in-kind costs. The in-kind contribution total should be listed separately.

Provide budget information in the order listed below. Budget detail is required for:

- In-Kind Costs:** The dollar value of non-cash donations to the project. These donations may be in the form of space, supplies, salaries, etc. The costs should be calculated at the verifiable fair-market value.
- Personnel:** Costs of employee salaries and wages. For each staff person, provide the name (if known), title, time commitment to the project as a percentage of a full-time

equivalent (FTE), annual salary, and grant-funded salary. Do not include the costs of consultants. Consultants are to be included under “Contractual.”

- c. **Fringe Benefits**: Costs of employee fringe benefits unless treated as part of an approved indirect cost rate. Provide the method used to calculate the proposed rate amount. If a fringe benefit has been negotiated with, or approved by, a cognizant federal agency, **attach a copy of the negotiated fringe benefit agreement**. If no rate agreement exists, provide a breakdown of the amounts and percentages that comprise fringe benefit costs such as health insurance, FICA, retirement insurance, taxes, etc. Identify the base for allocating these fringe benefit expenses. (Attach the agreement to the application package.)
- d. **Travel**: Costs of project-related travel by employees of the applicant organization and/or subrecipient (do not include costs of sub-contractor or consultant travel). For each proposed trip, provide the purpose, number of travelers, travel origin and destination, number of days, and a breakdown of costs for airfare, lodging, meals, car rental, and incidentals. The basis for the airfare, lodging, meals, car rental, and incidentals must be provided, such as past trips, current quotations, Federal Travel Regulations, etc. Foreign travel is not permitted. The applicant must include costs for two staff members to attend a **mandatory** two-day grant recipient orientation training in Washington, D.C. the first year of the grant, and costs for a teacher/coordinator to attend a USCIS teacher training on activities and methods that promote linguistic and civic assimilation during the second year of the grant.
- e. **Equipment**: Any article of nonexpendable, tangible personal property having a useful life of more than one year and an acquisition cost which equals or exceeds the lesser of (a) the capitalization level established by the organization for financial statement purposes, or (b) \$5,000. For each type of equipment requested, provide a description of the equipment, the cost per unit, the number of units, the total cost, and a plan for use on the project, as well as use or disposal of the equipment after the project ends. An applicant organization that uses its own definition for equipment should provide a copy of its policy or section of its policy which includes the equipment definition.

NOTE 1: Acquisition cost means the net invoice unit price of an item of equipment, including the cost of any modifications, attachments, accessories, calibration and maintenance services, or auxiliary apparatus necessary to make it usable for the purpose for which it is acquired. Ancillary charges, such as taxes, duty, protective in-transit insurance, freight, and installation must be included in or excluded from acquisition cost in accordance with the organization’s regular written accounting practices.

NOTE 2: Before purchasing equipment in the amount of \$5,000 or more per unit cost, the Recipient must obtain the written approval from DHS. For equipment purchased with grant funds (or received under a grant) and having a \$5,000 or more per unit cost, the Recipient must maintain an annual inventory, which will include a

brief description of the item, serial number, and amount of purchase. The inventory must also identify the sub-award under which the equipment was purchased.

Maintenance and insurance will be the responsibility of the Recipient. Title of equipment will remain with the Recipient until closeout when disposition will be provided in writing by DHS within 120 days of submission of final reports.

- f. **Supplies:** Costs of all tangible personal property other than that included in the equipment category. Specify general categories of supplies and their costs. Show computations and provide other information which supports the amount requested. Grantees should calculate the cost of assessments as well as printing the USCIS required assessment.
- g. **Contractual:** Costs of all contracts for services and goods except for those that belong under other categories such as equipment, supplies, construction, etc. Include third party evaluation contracts (if applicable) and contracts with secondary recipient organizations.

Demonstrate that all procurement transactions will be conducted in a manner to provide, to the maximum extent practical, open and free competition. Identify proposed sub-contractor work and the cost of each sub-contractor. Provide a detailed budget for each sub-contractor that is expected to perform work estimated to be \$25,000 or more, or 50% of the total work effort, whichever is less.

- Identify each planned subcontractor and its total proposed budget. Each subcontractor's budget and supporting detail should be included as part of the applicant's budget narrative.
- Provide the following information for each planned subcontract: a brief description of the work to be subcontracted; the number of quotes solicited and received, if applicable; the cost or price analysis performed by the applicant; names and addresses of the subcontractors tentatively selected and the basis for their selection; e.g., unique capabilities (for sole source subcontracts), low bidder, delivery schedule, technical competence; type of contract and estimated cost and fee or profit; and, affiliation with the applicant, if any.
- Recipient may be required to make pre-award review and procurement documents available to DHS, including request for proposals or invitations for bids, independent cost estimates, etc. This may include procurements expected to exceed the simplified acquisition threshold fixed at 41 U.S.C. § 403(11) (currently set at \$100,000) and expected to be awarded without competition or only one bid or offer is received in response to a solicitation.
- All required flow down provisions in the award must be included in any subcontract.

NOTE: Applicants may propose a sub-contract for specific tasks, such as hiring additional citizenship instructors on a contractual basis. However, the applicant must demonstrate its ability to successfully manage all aspects of the grant-funded project, including financial management. **Private law firms and attorneys in private practice are not eligible to receive funding under this funding opportunity.**

- h. **Other Direct Costs:** Any other items proposed as direct costs. Provide an itemized list with costs and state the basis for each proposed item.

Attach a copy of the latest indirect cost rate agreement negotiated with a cognizant federal agency. If the applicant is in the process of initially developing or renegotiating a rate, upon notification that an award will be made, it should immediately develop a tentative indirect cost rate proposal based on its most recently completed fiscal year, in accordance with the cognizant agency's guidelines for establishing indirect cost rates and submit it to the cognizant agency. Applicants awaiting approval of their indirect cost proposals may also request indirect costs.

When an indirect cost rate is requested, those costs included in the indirect cost pool should not also be charged as direct costs to the award. If the applicant is requesting a rate which is less than what is allowed under the program, the authorized representative of the applicant organization must submit a signed acknowledgement that the applicant is accepting a lower rate than allowed.

Any non-federal entity that has never received a negotiated indirect cost rate (except for those non-federal entities described in Appendix VII to Part 200 States and Local Government and Indian Tribe Indirect Cost Proposals, paragraph D.1.b) may elect to charge a de minimis rate of 10% of modified total direct costs (MTDC) which may be used indefinitely. As described in §200.403 Factors Affecting Allowability of Costs, costs must be consistently charged as either indirect or direct costs but may not be double charged or inconsistently charged as both. If chosen, this methodology once elected must be used consistently for all federal awards until such time as a non-federal entity chooses to negotiate for a rate, which the non-federal entity may apply to do at any time. For more information, see 2 CFR Part 200.414.


9. Documentation of Non-profit and/or Public Status

The applicant and any proposed subrecipient must provide documentation of non-profit and/or public status. Any of the following constitutes acceptable proof of non-profit status:

- a. A reference to the applicant organization's listing in the Internal Revenue Service's (IRS) most recent list of tax-exempt organizations described in section 501(c)(3) of the IRS Code.
- b. A copy of a currently valid IRS tax exemption certificate.
- c. A statement from a state taxing body, State attorney general, or other appropriate State official certifying that the applicant organization has a non-profit status and that none of the net earnings accrue to any private shareholders or individuals.
- d. A certified copy of the organization's certificate of incorporation or similar document that clearly establishes non-profit status.
- e. Any of the items in the subparagraphs immediately above for a State or national parent organization and a statement signed by the parent organization that the applicant organization is a local non-profit affiliate.
- f. A signed statement on official letterhead by an official authorized to apply for grant funds on behalf of the public entity will suffice.

Attach documentation of non-profit and/or public status to the application package.

APPENDIX B: FY 2024 CINAS APPLICANT CHECKLIST

	Ineligible if Missing ¹¹	Non-Responsive if Missing ¹²	Required or Requested Attachments
Forms:			
		X	Form SF-424, Application for Federal Assistance
		X	Form SF-424A, Budget
		X	Form SF-424B, Assurances for Non-Construction Programs
		X	Certification Regarding Lobbying, as applicable
Other Documents:			
			Project Abstract (single-spaced, 5 page maximum)
	X		Project Narrative that clearly states applicants and proposed subrecipients previous experience with citizenship preparation services
			Curriculum outline or syllabus
			Résumés of key personnel or position descriptions for vacant key positions
			Organizational chart for the applicant and any subrecipients
	X		Memorandum of Understanding (MOU) with subrecipient(s), signed by all parties (if applicable)
	X		Program Goals Chart
		X	Budget Table and Narrative (for applicant and subrecipient)
			Negotiated Fringe Benefit Agreement (if applicable)
			Indirect Cost Agreement (if applicable)
			Documentation of non-profit and/or public status (for applicant and proposed subrecipients)

¹¹ USCIS will not review if missing.

¹² DHS will not review if missing.

APPENDIX C: USCIS RESOURCES FOR CITIZENSHIP EDUCATION PROGRAMS

Educators and volunteers play a critical role in helping immigrants prepare for U.S. citizenship. The USCIS Citizenship Resource Center provides an array of resources and materials to support educators and programs working to prepare immigrants for the naturalization process. Below are a few key resources that all programs should be familiar with. For a full list of resources, please visit the Citizenship Resource Center at uscis.gov/citizenship.

USCIS Adult Citizenship Education Program Development Guide: Building an Adult Citizenship Program

This program development guide outlines a step-by-step process to create or sustain an adult citizenship education program and includes products and resources from U.S. Citizenship and Immigration Services (USCIS) for use at each stage of program development.

Elements of Program Quality for Adult Citizenship Education

This document provides a general framework for preparing permanent residents for the civics and English components of the naturalization interview and test.

USCIS Guide to Creating an Adult Citizenship Education Curriculum

This guide assists adult education program administrators and teachers in developing a citizenship curriculum and thematic lessons, choosing textbooks and supplemental materials, and creating effective learning activities.

Adult Citizenship Education Sample Curriculum for a High Beginning ESL Level Course

This publication outlines the components, structure, and process involved with creating an adult citizenship education curriculum.

Additional Citizenship Education Resources:

- [Resources for Educators About the Naturalization Process](#)
- [Prepare Students for the Interview and Test](#)
- [Learn New Teaching Techniques](#)
- [Start a Citizenship Program](#)
- [Promote a Citizenship Program](#)
- [Train and Develop Staff](#)

APPENDIX D: FY 2023 CINAS GRANT GLOSSARY

TERM	DEFINITION
Attorney	Any person who is eligible to practice law in and is a member in good standing of the bar of the highest court of any state, possession, territory, or commonwealth of the United States, or of the District of Columbia, and is not under any order suspending, enjoining, restraining, disbaring, or otherwise restricting him or her in the practice of law. See 8 CFR Part 1.2 .
Authorized practice of immigration law	Occurs when an authorized and qualified individual or organization provides accurate and current legal advice on immigration-related matters. Typically, this is limited to DOJ-accredited representatives who work for DOJ-recognized organizations or to an attorney who is a member in good standing of the bar of a U.S. state. See 8 CFR Part 292 , 8 CFR Part 103.2(a)(3) , and 8 CFR Part 1.2 .
Citizenship Instruction	Educational services that provide enrolled Lawful Permanent Residents (LPR's) with the skills and knowledge needed to prepare for citizenship, including instruction in English as a Second Language (ESL), U.S. history and government, and the naturalization process.
Citizenship Preparation Services	Services that help prepare Lawful Permanent Residents for naturalization, including citizenship instruction and naturalization application services.
Civics-based ESL	Civics-based ESL focuses more heavily on teaching the English structures needed to understand the concepts found within the naturalization test as well as those to assist students to become more integrated community members (this is targeted at program beneficiaries assessed at National Reporting System for Adult Education (NRS) Level 2 – Low Beginning ESL).
Civics-based Literacy	Civics-based literacy includes using civics and integration concepts and themes to teach low-level students basic English grammar and vocabulary preparing them for civics-based ESL (this is targeted at program beneficiaries assessed at National Reporting System for Adult Education (NRS) Level 1 – Beginning ESL).
Class cycle	The time period, such as a term or semester, when classes are held on a frequent or regular basis. This time period has a beginning and end date.

TERM	DEFINITION
Cognizant agency for indirect costs	<p>The Federal agency responsible for reviewing, negotiating, and approving cost allocation plans or indirect cost proposals developed under this part on behalf of all Federal agencies. The cognizant agency for indirect cost is not necessarily the same as the cognizant agency for audit. For assignments of cognizant agencies see the following:</p> <ul style="list-style-type: none"> (1) For Institutions of Higher Education (IHEs) (2) For nonprofit organizations (3) For State and local governments (4) For Indian tribes
Cost sharing or matching	<p>The portion of the project costs not paid by federal funds or contributions (unless otherwise authorized by Federal statute).</p>
Citizenship Instruction	<p>Educational services that provide enrolled Lawful Permanent Residents (LPR's) with the skills and knowledge needed to prepare for citizenship, including instruction in English as a Second Language (ESL), U.S. history and government, and the naturalization process.</p>
Citizenship Preparation Services	<p>Services that help prepare Lawful Permanent Residents for naturalization, including citizenship instruction and naturalization application services.</p>
Direct costs	<p>Costs that can be identified specifically with a particular sponsored project or an institutional activity, or easily assigned to activities with a high degree of accuracy. Examples include the salaries of staff assigned to a specific project, materials and supplies, and travel. For more information, see 2 CFR Part 200.413.</p>
DOJ accreditation	<p>A program allowing a specially qualified non-lawyer to represent noncitizens on behalf of a recognized organization.</p> <p>Please refer to the links below for additional information:</p> <p>Recognition of Organizations and Accreditation of Non-Attorney Representatives</p> <p>https://www.justice.gov/eoir/recognition-and-accreditation-program</p>

TERM	DEFINITION
DOJ-accredited representative	<p>A representative is “accredited” when the Executive Office for Immigration Review’s (EOIR) Office of Legal Access Programs gives permission to a specially qualified non-lawyer to represent noncitizens on behalf of a recognized organization. There are two kinds of accreditation: “partial” and “full.” A partially accredited representative may represent noncitizens before the Department of Homeland Security (DHS) only. A fully accredited representative may represent noncitizens before both DHS and EOIR, which includes the immigration courts and the Board of Immigration Appeals (BIA).</p>
DOJ-recognized organization (DOJ recognition)	<p>A nonprofit organization that has permission from the Executive Office for Immigration Review’s (EOIR) Office of Legal Access Programs to practice immigration law through accredited representatives.</p> <p>An organization is “recognized” when the Office of Legal Access Programs gives a non-profit organization in the United States permission to practice immigration law through accredited representatives before DHS only (partial accreditation) or DHS and EOIR (full accreditation). EOIR includes the immigration courts and the Board of Immigration Appeals (BIA). By regulation, a nonprofit, federal tax-exempt, religious, charitable, social service, or similar organization established in the United States that has been approved for recognition is called a recognized organization.</p> <p>Visit the DOJ’s Recognition and Accreditation Program page to learn how an organization can apply for recognition and accreditation.</p>
Employee	<p>A person who provides services to an employer in exchange for compensation and who does not provide these services as part of an independent business. The term does not include board members or contracted individuals. The following factors of a job arrangement may indicate that an individual is an employee:</p> <ol style="list-style-type: none"> The employer pays the individual; The employer may fire the individual; The employer provides the individual with tools or equipment and a place to work; The employer trains the individual; The individual is required to follow the employer’s instructions; The employer sets or can set the individual’s work hours; The employer restricts the individual from working for others; and Other applicable factors.

TERM	DEFINITION
Employer	In the context of this notice of funding opportunity, an employer is an organization with public or non-profit status that has the ability to hire, pay, fire, supervise, or otherwise control the work of an employee.
EOIR	An abbreviation for the Executive Office for Immigration Review (EOIR), which is an agency within the Department of Justice (DOJ). Under delegated authority from the Attorney General, immigration judges and the Board of Immigration Appeals, EOIR's appellate component, interprets and adjudicates immigration cases according to United States immigration laws. Within EOIR, the Office of Legal Access Programs administers the program that grants recognition to organizations and accreditation of their representatives.
Form G-28, Notice of Entry of Appearance as Attorney or Accredited Representative	The form that attorneys and accredited representatives use to provide information establishing their eligibility to appear and act on behalf of an applicant, petitioner, or respondent before USCIS. Form G-28 is available at uscis.gov/g-28 .
Form N-400, Application for Naturalization	The form used to apply for U.S. citizenship. Form N-400 is available at uscis.gov/n-400 .
Form N-600, Application for Naturalization	The form used to apply for a certificate of U.S. citizenship. Form N-600 is available at uscis.gov/n-600 .
Form N-648, Medical Certification for Disability Exceptions	The form for applicants who seek an exception to the English and civics testing requirements for naturalization because of physical or developmental disability or mental impairment. Form N-648 is available at uscis.gov/n-648 .
Form I-912, Request for a Fee Waiver	The USCIS form used by applicants and petitioners to request a waiver for certain application processing fees. Form I-912 is available at uscis.gov/i-912 .
Fringe benefits	Allowances and services provided by employers to their employees as compensation in addition to regular salaries and wages.
Fringe benefit rate	The value of fringe benefits expressed as a percentage of salary. Calculate the dollar amount by applying the appropriate fringe benefit percentage rate to each employee's salary to be charged to the project. For more information, see OMB Circular A-21, OMB Circular A-87, or OMB Circular A-122.

Appendix D: FY 2023 CINAS Grant Glossary

TERM	DEFINITION
Fringe benefit rate agreement	An agreement that has been approved by a cognizant federal agency (usually the agency that provides the most funding to the grant recipient) that establishes the rate at which an organization will request reimbursement for fringe benefits under the grant program.
FY	An abbreviation for fiscal year. The federal government's fiscal year runs from October 1st to September 30th.
Indirect (facilities & administrative (F&A)) costs	Those costs incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. To facilitate equitable distribution of indirect expenses to the cost objectives served, it may be necessary to establish a number of pools of indirect (F&A) costs. Indirect (F&A) cost pools must be distributed to benefitted cost objectives on bases that will produce an equitable result in consideration of relative benefits derived.
Indirect cost rate proposal	The documentation prepared by a non-Federal entity to substantiate its request for the establishment of an indirect cost.
In-kind contribution	The value of non-cash contributions (such as property or services) that: <ol style="list-style-type: none"> 1. Benefit a federally assisted project or program; and 2. Are provided for free by non-federal third parties to a recipient, sub-recipient, or cost-type contractor under the award.
Key Personnel	Key personnel is defined as any person (employee/volunteer) who is paid by the grant and whose work is integral to the goals of the grant program. Key personnel may include; attorney, grant/program manager, BIA accredited representative, instructor, etc., this list is not exhaustive.
Legal advice	A legal opinion or recommendation offered as a guide to action and based on applying the law to a given set of facts.
Memorandum of Understanding (MOU)	A formal agreement between parties that defines each party's rights and responsibilities.
National Reporting System (NRS)	An outcome-based reporting system developed by the U.S. Department of Education for state-administered, federally funded adult education programs. For more information, see this list of NRS test benchmarks for educational functioning levels.

TERM	DEFINITION
Nationally normed standardized assessment test	In the context of citizenship instruction, this refers to specific tests used to determine a student’s English language proficiency. The Department of Education has a list of approved standardized tests .
Naturalization application services	Legal services, provided within the scope of the authorized practice of immigration law, that help immigrants go through the naturalization application and interview process. Services may include naturalization eligibility screening, legal advice, Form N-400 preparation and submission, and interview preparation.
Naturalization eligibility screening	A systematic assessment conducted by an attorney or BIA-accredited representative to determine if an individual is eligible to apply for U.S. citizenship. Eligibility screenings include legal advice.
Non-duplicated citizenship students	A student enrolled in a grant-funded citizenship class for the first time. A program cannot count a student as newly enrolled more than once during the grant performance period, even if the student enrolls in multiple classes.
Nonprofit organization	Any corporation, trust, association, cooperative or other organization which: <ul style="list-style-type: none"> a. Operates primarily for scientific, educational, service, charitable or similar purposes in the public interest; b. Is not organized primarily for profit; and c. Uses its net proceeds to maintain, improve and/or expand its operations.
Non-responsive application	An application that does not meet one or more of the requirements listed under Eligibility Information – Non-Responsive Applications in the notice of funding opportunity. We will not review applications that are non-responsive.
Partner organization	Grant applicants may include a partner organization in their proposal. The partner may provide a portion of the direct services or some other contribution to the applicant’s proposed grant project. A partner organization is considered a “subrecipient” if the organization will receive a portion of the grant funding to provide additional or complementary direct services. The partner organization may provide citizenship instruction, naturalization application services, or both.

TERM	DEFINITION
Period of performance	The total estimated time interval between the start of an initial Federal award and the planned end date, which may include one or more funded portions, or budget periods. Identification of the period of performance in the Federal award per § 200.211(b)(5) does not commit the awarding agency to fund the award beyond the currently approved budget period.
Private practice	To engage in one's profession as an independent provider rather than as an employee.
Pro bono attorney	An attorney who provides legal services voluntarily and without payment as a public service.
Qualified Citizenship Instructor	Under the CIGP, a qualified instructor is one with a degree in education (K-12 Social Studies, English Language Arts, History, Linguistics, Teaching English to Speakers of Other Languages (TESOL), or Adult Education) or someone with at least one year of experience as the lead teacher in a class for adult immigrants. Although not a requirement, programs whose instructors have the following education, certification, and/or experience are generally more likely to be scored higher than programs that do not: <ul style="list-style-type: none"> a.) Hold a degree in TESOL; b.) Hold TESOL certification from a state licensing agency; or c.) Have a minimum of two years of experience in TESOL instruction in a classroom setting for an adult education program that utilizes a textbook and a structured curriculum.
Qualified Legal Service Provider	Under the CIGP, a qualified legal service provider is one of the following: <ul style="list-style-type: none"> a.) A U.S. Department of Justice (DOJ) Accredited Representative serving a DOJ Recognized Organization. Partial accreditation is permitted; or b.) An attorney who is an employee of the applicant or the proposed subrecipient organization. <ul style="list-style-type: none"> 1.) Attorneys working under this grant must have training in immigration law and be able to provide legal representation to clients. 2.) Hours charged to the grant should be in alignment with the goals of the application. 3.) Pro bono or volunteer attorneys may be used to supplement the program but may not:

TERM	DEFINITION
	<ul style="list-style-type: none"> i. Serve as the applicant’s sole provider of immigration legal services; or ii. Serve as a supervisor to staff members who provide naturalization application services but who are not qualified legal service providers.
Quarter	<p>There are four quarters in a fiscal year. The quarterly dates are as follows:</p> <p>Quarter 1: October 1 to December 31</p> <p>Quarter 2: January 1 to March 31</p> <p>Quarter 3: April 1 to June 30</p> <p>Quarter 4: July 1 to September 30</p>
Representation	Includes “practice” and “preparation” as defined in 8 CFR Part 1.2 .
Subrecipient	An entity, usually but not limited to non-Federal entities, that receives a subaward from a pass-through entity to carry out part of a federal award; but does not include an individual that is a beneficiary of such award. A subrecipient may also be a recipient of other Federal awards directly from a federal awarding agency. Under USCIS grant program applicants must include a Memorandum of Understanding signed by the applicant and potential subrecipient. Potential subrecipients must also have a UEI number.
Subcontract	A legal contract in which the grant recipient hires an individual, business or organization to do a specific task or set of tasks. Subcontracting is permitted under the Citizenship and Integration Grant Program, but applicants may <i>only</i> propose a subcontract for specific tasks, such as hiring additional citizenship instructors on a contractual basis. Applicants may not enter into a subcontract with a private attorney. Applicants must demonstrate their ability to successfully manage all aspects of the grant-funded project, including financial management.
Unique Entity Identifier (UEI)	A unique nine-character identification number requested in, and assigned by, the System for Award Management (Sam.gov). Organizations must request a UEI prior to applying for this funding opportunity.

EXHIBIT O

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

Solutions in Hometown Connections, et al.,

Plaintiffs,

v.

Kristi Noem, et al.,

Defendants.

Civil Case No. 8:25-cv-885-LKG

DECLARATION OF SARAH M. RICH

I, Sarah M. Rich, declare under penalty of perjury, under 28 U.S.C. § 1746, that the following is true and correct:

1. I am an attorney at Democracy Forward and counsel to all Plaintiffs in the above-captioned matter. I submit this Declaration in further support of the Memorandum of Law in Support of Plaintiffs' Motion for Temporary Restraining Order, Preliminary Injunction and APA § 705 Stay ("Plaintiffs' Brief").

2. **Exhibit A** to Plaintiffs' Brief is a true and correct copy of a memorandum issued by Defendant Kristi Noem and dated January 28, 2025, which was filed as an exhibit in *State of New York, et al. v. Donald Trump, et al.*, Case No. 1:25-cv-00039-JJM-PAS (D.R.I.).

3. I have performed multiple searches via internet search engines for an official copy of Secretary Noem's January 28, 2025 memo. I have found no such official copy posted online. The only version I have been able to locate online, other than Exhibit A, is a version produced in two screenshots within a post on the social media site X:

<https://x.com/benwermund/status/1885045397460312137?t=-uKBNcypKKa-SMZhdQK2Jw>.

4. **Exhibit B** to Plaintiffs' Brief is a true and correct copy of the letter from Mary Jane Sommerville that was attached to emails received by all Plaintiffs on February 4, 2025.

5. **Exhibit C** to Plaintiffs' Brief is a true and correct copy of a declaration of Merritt Groeschel of Plaintiff Solutions in Hometown Connections.

6. **Exhibit D** to Plaintiffs' Brief is a true and correct copy of a declaration of Abel Nunez of Plaintiffs Central American Resource Center.

7. **Exhibit E** to Plaintiffs' Brief is a true and correct copy of a declaration of Angelica Salas of Plaintiffs Coalition for Humane Immigrant Rights.

8. **Exhibit F** to Plaintiffs' Brief is a true and correct copy of a declaration of Caitlyn Lewis of Community Center for Immigrants, Inc.

9. **Exhibit G** to Plaintiffs' Brief is a true and correct copy of a declaration of Katie Donoviel of Plaintiff English Skills Learning Center.

10. **Exhibit H** to Plaintiffs' Brief is a true and correct copy of a declaration of Ken Whittaker of Plaintiff Michigan United.

11. **Exhibit I** to Plaintiffs' Brief is a true and correct copy of a declaration of Cathryn Miller-Wilson of Plaintiff HIAS Pennsylvania.

12. **Exhibit J** to Plaintiffs' Brief is a true and correct copy of a declaration of Tracy Roy of Plaintiff Immigrant Law Center of Minnesota.

13. **Exhibit K** to Plaintiffs' Brief is a true and correct copy of a declaration of Karina Ayala-Bermejo of Plaintiff Instituto del Progreso Latino.

14. **Exhibit L** to Plaintiffs' Brief is a true and correct copy of the DHS Notice of Funding Opportunity for the FY 2023 CINAS grant.

15. **Exhibit M** to Plaintiffs' Brief is a true and correct copy of the DHS Notice of Funding Opportunity for the FY 2023 CARING grant.

16. **Exhibit N** to Plaintiffs' Brief is a true and correct copy of the DHS Notice of Funding Opportunity for the FY 2024 CINAS grant.

Atlanta, GA
March 24, 2025

Sarah M. Rich

Sarah M. Rich